

Dominion Energy Southeast Services, Inc.
Legal Regulatory Department
400 Otarre Parkway, Cayce, SC 29033
Mailing Address:
220 Operation Way, MC C222, Cayce SC 29033
DominionEnergy.com



May 20, 2019

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29211

RE: **Joint Petition of Aiken Electric Cooperative, Inc., Little River Electric Cooperative, Inc., Duke Energy Carolinas, LLC, and Dominion Energy South Carolina, Inc. for the Assignment and Reassignment of Territory in McCormick, Abbeville, and Greenwood Counties and Approval of Agreements to Limit Corridor Rights**
Docket No. 2019-____-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Aiken Electric Cooperative, Inc., Little River Electric Cooperative, Inc., Duke Energy Carolinas, LLC, and Dominion Energy South Carolina, Inc. is the Joint Petition for the Assignment and Reassignment of Territory in McCormick, Abbeville, and Greenwood Counties and Approval of Agreements to Limit Corridor Rights.

By copy of this letter we are also providing a copy of the Joint Petition to the South Carolina Office of Regulatory Staff and enclose a certificate of service to that effect.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink that reads "Matthew W. Gissendanner".

Matthew W. Gissendanner

MWG/kms

Enclosures

cc: **Jeffrey M. Nelson, Esquire**
Dawn Hipp

J. David Black, Esquire
Frank R. Ellerbe III, Esquire

(all via electronic mail and U.S. First Class Mail w/enclosures)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-__-E

IN RE:

Joint Petition of Aiken Electric Cooperative, Inc.,)	CERTIFICATE OF SERVICE
Little River Electric Cooperative, Inc.,)	
Duke Energy Carolinas, and Dominion Energy)	
South Carolina, Inc. for the Assignment and)	
Reassignment of Territory in McCormick,)	
Abbeville, and Greenwood Counties and)	
Approval of Agreements to Limit Corridor Rights)	

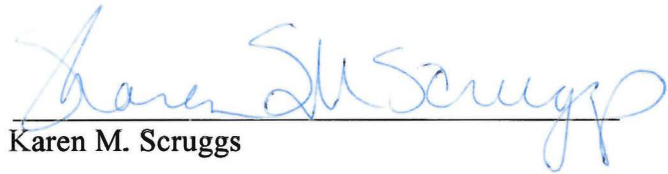
This is to certify that I have caused to be served this day one (1) copy of the **Joint Petition for Assignment and Reassignment of Territory and to Limit Corridor Rights** via electronic mail and U.S. First Class Mail to the persons named below at the addresses set forth:

Dawn Hipp
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
dhipp@ors.sc.gov

Jeffrey M. Nelson, Esquire
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dblack@nexsenpruet.com

Frank R. Ellerbe III, Esquire
Robinson Gray Stepp & Lafitte, LLC
Post Office Box 11449
Columbia, SC 29211
fellerbe@robinsongray.com


Karen M. Scruggs

Cayce, South Carolina

This 20th day of May, 2019

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-__-E

IN RE:

Joint Petition of Aiken Electric Cooperative, Inc., Little River Electric Cooperative, Inc., Duke Energy Carolinas, LLC, and Dominion Energy South Carolina, Inc. for the Assignment and Reassignment of Territory in McCormick, Abbeville, and Greenwood Counties and Approval of Agreements to Limit Corridor Rights.

**JOINT PETITION FOR ASSIGNMENT
AND RE-ASSIGNMENT OF TERRITORY**

Aiken Electric Cooperative, Inc. ("Aiken Electric"), Little River Electric Cooperative, Inc. ("Little River Electric"), Duke Energy Carolinas, LLC ("DEC"), and Dominion Energy South Carolina, Inc. ("Dominion Energy South Carolina") (collectively, the "Petitioners") hereby jointly petition the Public Service Commission of South Carolina (the "Commission") for assignment and reassignment of certain territory in McCormick, Abbeville, and Greenwood Counties and approval of agreements to eliminate "corridor rights" in the specified areas. This Joint Petition is made pursuant to The Territorial Assignment Act, S.C. Code Ann. §§ 58-27-610 to -690 (2015).

I. Introduction

In support of this Joint Petition, Petitioners allege and show unto the Commission the following:

1. Dominion Energy South Carolina is a corporation organized and existing under the laws of the State of South Carolina. Further, Dominion Energy South Carolina is, in part, an electrical utility engaged in the generation, transmission, distribution, and sale of electricity to the public for compensation. Dominion Energy South Carolina's retail electric operations are subject to the jurisdiction of the Commission. Additionally, Dominion Energy South Carolina is an electric supplier as defined by the Territorial Assignment Act. S.C. Code Ann. § 58-27-610(1) (2015).

2. DEC is a corporation organized and existing under the laws of the State of North Carolina and is authorized to transact business in the State of South Carolina. Further,

DEC is an electrical utility engaged in the generation, transmission, distribution, and sale of electricity to the public for compensation. **DEC's retail electric operations in South Carolina are subject to the jurisdiction of the Commission. Additionally, DEC is an electric supplier as defined by the Territorial Assignment Act. S.C. Code Ann. § 58-27-610(1) (2015).**

3. **Aiken Electric and Little River Electric are subject to the limited jurisdiction of the Commission as an electric supplier as defined by the Territorial Assignment Act. S.C. Code Ann. § 58-27-610(1) (2015).**

4. **The Commission may assign to electric suppliers areas outside the corporate limits of municipalities and that are more than 300 feet from the lines of electric suppliers. S.C. Code Ann. § 58-27-640 (2015).**

5. **Upon agreement of the affected electric suppliers, the Commission may reassign portions of previously assigned service areas. S.C. Code Ann. § 58-27-650(A) (2015).**

6. **The Commission has the authority to approve agreements between electric suppliers concerning corridor rights. The Commission shall approve those agreements if, after giving notice and an opportunity for hearing to interested parties, it finds the agreements to be fair and reasonable. S.C. Code Ann. § 58-27-620(8) (2015).**

7. **The Commission has previously exercised its statutory authority and assigned electric service territories within the affected portions of McCormick County, South Carolina, to Aiken Electric, Little River Electric, DEC, and Dominion Energy South Carolina.**

8. **The Commission has previously exercised its statutory authority and assigned electric service territories within the affected portions of Abbeville County, South Carolina, to Little River Electric and Dominion Energy South Carolina.**

9. **The Commission has previously exercised its statutory authority and assigned electric service territories within the affected portions of Greenwood County, South Carolina, to Aiken Electric, DEC and Dominion Energy South Carolina.**

10. **The herein proposed assignment and re-assignment of territories among the Petitioners will not cause any customers to change their service; that is, no customers will be affected by the Joint Petition.**

11. **Exhibit 1, attached to this Petition and incorporated herein by reference, is the "Key Map" that depicts the present and proposed assignment of territories in the affected portions of McCormick County. This Key Map is the result of lengthy good faith negotiations between Aiken Electric, Little River Electric, DEC, and Dominion Energy South Carolina to assign and re-assign various territories within McCormick County. The characteristics of the Key Map are as follows:**

- a. On **Exhibit 1**, the affected portions of McCormick County are divided into grid blocks (*e.g.*, A3, E5). Each grid block represents a distinct portion of **McCormick County**, and is described in further detail by way of additional exhibits attached to this **Joint Petition**. These grid blocks depict the proposed assignment and/or reassignment of territory at the street level.
- b. On **Exhibit 1**, territory that is shaded in light green is presently assigned to **Little River Electric**.
- c. On **Exhibit 1**, territory that is shaded in dark green is presently assigned to **Dominion Energy South Carolina, DEC, or Aiken Electric** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **Little River Electric**.
- d. On **Exhibit 1**, territory that is shaded in light orange is presently assigned to **Aiken Electric**.
- e. On **Exhibit 1**, territory that is shaded in dark orange is presently assigned to **Dominion Energy South Carolina, DEC, or Little River** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **Aiken Electric**.
- f. On **Exhibit 1**, territory that is shaded in light blue is presently assigned to **DEC**.
- g. On **Exhibit 1**, territory that is shaded in dark blue is presently assigned to **Dominion Energy South Carolina, Aiken Electric, or Little River Electric** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **DEC**.
- h. On **Exhibit 1**, territory that is shaded in light red is presently assigned to **Dominion Energy South Carolina**.
- i. On **Exhibit 1**, territory that is shaded in dark red is presently assigned to **DEC, Aiken Electric, or Little River Electric** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **Dominion Energy South Carolina**.
- j. On **Exhibit 1**, territory that is shaded in light yellow is presently unassigned.
- k. On **Exhibit 1**, territory that is shaded in dark yellow is presently assigned to **Dominion Energy South Carolina, DEC, Aiken Electric, or Little River Electric**, but the Petitioners request that the territory hereafter be unassigned.

- l. On **Exhibit 1**, the area that is shaded in purple represents a municipality; electric service within the municipality's boundary is governed by the municipality pursuant to certain franchise agreements. Therefore, electric service within this area is not affected by the Joint Petition.

12. **Exhibit 2**, attached to this Petition and incorporated herein by reference, is the "Key Map" that depicts the present and proposed assignment of territories in the affected portions of Abbeville County. This Key Map is the result of lengthy good faith negotiations between Little River Electric and Dominion Energy South Carolina to assign and re-assign various territories within Abbeville County. The characteristics of the Key Map are as follows:

- a. On **Exhibit 2**, the affected portions of Abbeville County are divided into grid blocks (e.g., F1, G2). Each grid block represents a distinct portion of Abbeville County, and is described in further detail by way of additional exhibits attached to this Joint Petition. These grid blocks depict the proposed assignment and/or reassignment of territory at the street level.
- b. On **Exhibit 2**, territory shaded in light green is presently assigned to Little River Electric.
- c. On **Exhibit 2**, territory that is shaded in dark green is presently assigned to Dominion Energy South Carolina or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Little River Electric.
- d. On **Exhibit 2**, territory that is shaded in light red is presently assigned to Dominion Energy South Carolina.
- e. On **Exhibit 2**, territory that is shaded in dark red is presently assigned to Little River Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Dominion Energy South Carolina.
- f. On **Exhibit 2**, the area that is shaded in purple represents a municipality; electric service within the municipality's boundary is governed by the municipality pursuant to certain franchise agreements. Therefore, electric service within this area is not affected by the Joint Petition.

13. **Exhibit 3**, attached to this Petition and incorporated herein by reference, is the "Key Map" that depicts the present and proposed assignment of territories in the affected portions of Greenwood County. This Key Map is the result of lengthy good faith negotiations between Aiken Electric, DEC, and Dominion Energy South Carolina to assign and re-assign various territories within Greenwood County. The characteristics of the Key Map are as follows:

- a. On **Exhibit 3**, the affected portions of Greenwood County are divided into grid blocks (*e.g.*, H1, H2). Each grid block represents a distinct portion of **Greenwood County**, and is described in further detail by way of additional exhibits attached to this **Joint Petition**. These grid blocks depict the proposed assignment and/or reassignment of territory at the street level.
- b. On **Exhibit 3**, territory shaded in light orange is presently assigned to Aiken Electric.
- c. On **Exhibit 3**, territory that is shaded in dark orange is presently assigned to DEC or **Dominion Energy South Carolina** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Aiken Electric.
- d. On **Exhibit 3**, territory shaded in light blue is presently assigned to DEC.
- e. On **Exhibit 3**, territory that is shaded in dark blue is presently assigned to **Dominion Energy South Carolina** or Aiken Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to DEC.
- f. On **Exhibit 3**, territory that is shaded in light red is presently assigned to **Dominion Energy South Carolina**.
- g. On **Exhibit 3**, territory that is shaded in dark red is presently assigned to DEC or Aiken Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **Dominion Energy South Carolina**.
- h. On **Exhibit 3**, the area that is shaded in purple represents a municipality; electric service within the municipality's boundary is governed by the municipality pursuant to certain franchise agreements. Therefore, electric service within this area is not affected by the **Joint Petition**.

II. Request to Assign Area in McCormick County and Reassign Territory in McCormick County

14. As shown on **Exhibit 1 (Key Map)** and enlarged on **Pages A1 – A4, B1 – B5, C2 – C5, D3 – D4, and E4– E5**:

- a. The territory that is shaded in light green is presently assigned to Little River Electric.
- b. The territory that is shaded in dark green is presently assigned to **Dominion Energy South Carolina**, DEC, or Aiken Electric or is presently unassigned,

but the Petitioners request that the territory hereafter be reassigned to Little River Electric.

- c. The territory that is shaded in light orange is presently assigned to Aiken Electric.
- d. The territory that is shaded in dark orange is presently assigned to Dominion Energy South Carolina, DEC, or Little River Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Aiken Electric.
- e. The territory that is shaded in light blue is presently assigned to DEC.
- f. The territory that is shaded in dark blue is presently assigned to Dominion Energy South Carolina, Aiken Electric, or Little River Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to DEC.
- g. The territory that is shaded in light red is presently assigned to Dominion Energy South Carolina.
- h. The territory that is shaded in dark red is presently assigned to DEC, Aiken Electric, or Little River Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Dominion Energy South Carolina.
- i. The territory that is shaded in light yellow is presently unassigned.
- j. The territory that is shaded in dark yellow is presently assigned to Dominion Energy South Carolina, DEC, Aiken Electric or Little River Electric, but the Petitioners request that the territory hereafter be unassigned.
- k. The area that is shaded in purple represents a municipality; electric service within the municipality's boundary is governed by the municipality pursuant to certain franchise agreements. Therefore, electric service within this area is not affected by the Joint Petition.

15. Petitioners respectfully request that the Commission assign the above detailed portions of McCormick County in accordance with the Petitioners' negotiated agreement.

16. Agreement to Limit Corridor Rights in Specified Areas in McCormick County

In the areas shown on the colored portions of **Exhibit 1**, Aiken Electric, Little River Electric, DEC, and Dominion Energy South Carolina own many miles of distribution lines that have "corridor rights;" therefore, by virtue of those corridor rights, Aiken Electric, Little

River Electric, DEC, and Dominion Energy South Carolina are each able to serve new customers located in territory assigned to another.

However, in order to avoid wasteful duplication of electric distribution lines and appurtenant facilities and to better operate their distribution systems safely, Aiken Electric, Little River Electric, DEC, and Dominion Energy South Carolina have agreed that they will abandon said corridor rights and not assert a corridor right to serve a customer outside the territory assigned to that Petitioner in McCormick County as set forth in the above paragraph.

HL. Request to Assign Area in Abbeville County and Reassign Territory in Abbeville County

17. As shown on **Exhibit 2 (Key Map)** and enlarged on **Pages F1- F2 and G1-G2:**

- a. The territory that is shaded in light green is presently assigned to Little River Electric.
- b. The territory that is shaded in dark green is presently assigned to Dominion Energy South Carolina or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Little River Electric.
- c. The territory that is shaded in light red is presently assigned to Dominion Energy South Carolina.
- d. The territory that is shaded in dark red is presently assigned to Little River Electric or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to Dominion Energy South Carolina.
- e. The area that is shaded in purple represents a municipality; electric service within the municipality's boundary is governed by the municipality pursuant to certain franchise agreements. Therefore, electric service within this area is not affected by the Joint Petition.

18. Petitioners respectfully request that the Commission assign the above detailed portions of Abbeville County in accordance with the Petitioners' negotiated agreement.

19. Agreement to Limit Corridor Rights in Specified Areas in Abbeville County

In the areas shown on the colored portions of **Exhibit 2**, Little River Electric and Dominion Energy South Carolina own many miles of distribution lines that have "corridor rights;" therefore, by virtue of those corridor rights, Little River Electric and Dominion Energy South Carolina are each able to serve new customers located in territory assigned to another.

However, in order to avoid wasteful duplication of electric distribution lines and appurtenant facilities and to better operate their distribution systems safely, Little River Electric and Dominion Energy South Carolina have agreed that they will abandon said corridor rights and not assert a corridor right to serve a customer outside the territory assigned to that Petitioner in Abbeville County as set forth in the above paragraph.

IV. Request to Assign Area in Greenwood County and Reassign Territory in Greenwood County

20. As shown on **Exhibit 3** (Key Map) and enlarged on **Pages H11 - H2:**

- a. The territory that is shaded in light orange is presently assigned to **Aiken Electric**.
- b. The territory that is shaded in dark orange is presently assigned to DEC or **Dominion Energy South Carolina** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **Aiken Electric**.
- c. The territory that is shaded in light blue is presently assigned to DEC.
- d. The territory that is shaded in dark blue is presently assigned to **Dominion Energy South Carolina** or **Aiken Electric** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to DEC.
- e. The territory that is shaded in light red is presently assigned to **Dominion Energy South Carolina**.
- f. The territory that is shaded in dark red is presently assigned to DEC or **Aiken Electric** or is presently unassigned, but the Petitioners request that the territory hereafter be reassigned to **Dominion Energy South Carolina**.
- g. The area that is shaded in purple represents a municipality; electric service within the municipality's boundary is governed by the municipality pursuant to certain franchise agreements. Therefore, electric service within this area is not affected by the **Joint Petition**.

21. Petitioners respectfully request that the Commission assign the above detailed portions of **Greenwood County** in accordance with the Petitioners' negotiated agreement.

22. **Agreement to Limit Corridor Rights in Specified Areas in Greenwood County**

In the areas shown on the colored portions of **Exhibit 3**, **Aiken Electric**, DEC, and **Dominion Energy South Carolina** own many miles of distribution lines that have "corridor

rights;" therefore, by virtue of those corridor rights, Aiken Electric, **DEC**, and **Dominion Energy South Carolina** are each able to serve new customers located in territory assigned to another.

However, in order to avoid wasteful duplication of electric distribution lines and appurtenant facilities and to better operate their distribution systems safely, Aiken Electric, **DEC**, and **Dominion Energy South Carolina** have agreed that they will abandon said corridor rights and not assert a corridor right to serve a customer outside the territory assigned to that Petitioner in **Greenwood County** as set forth in the above paragraph.

23. Petitioners allege that no facilities or territories of any other electric suppliers are affected by the changes Petitioners propose herein.

24. Petitioners allege that each is fully capable of furnishing adequate and dependable electric service in the areas that each now serves and would serve upon the Commission's granting of this Petition.

25. Petitioners have considered the public convenience and necessity in their negotiations and believe the assignment and reassignment of the above detailed territories are in the public interest and assert that the Commission's approval of this Petition will be in the public interest. By making the assignments of territory in the manner described in this Petition, Aiken Electric, Little River Electric, **DEC**, and **Dominion Energy South Carolina** have given careful consideration to system economy, service reliability and good utility practice, efficiency and safety- all of which support a finding that the assignment of territory set forth herein promotes public convenience and necessity. Moreover, the assignment and reassignment of these territories will avoid the duplication of utility facilities in these areas.

26. Petitioners respectfully request that the Commission determine this matter solely on the basis of this filing unless there are protests or petitions to intervene, and in that event, to set this matter for hearing and determination at the earliest possible date.

WHEREFORE, Aiken Electric Cooperative Inc., Little River Electric Cooperative, Inc., Duke Energy Carolinas, LLC, and **Dominion Energy South Carolina, Inc.** having jointly made petition to the Commission, pray that the Commission issue its order:

1. Accepting this Petition as filed;
2. Finding and determining that the territorial assignments and reassignments as set forth in Paragraphs 11 through 26 supersede any prior territorial assignment and that the assignments and reassignments are in accordance with the public convenience and necessity;
3. Reassigning to Aiken Electric the territories detailed in the attached exhibits and described above;

4. Reassigning to Little River Electric the territories detailed in the attached exhibits and described above;

5. Reassigning to DEC the territories detailed in the attached exhibits and described above;

6. Reassigning to Dominion Energy South Carolina the territories detailed in the attached exhibits and described above;

7. Reclassifying as unassigned the territories detailed in the attached exhibits and described above;

8. Approving the agreement among Petitioners wherein each has agreed not to assert corridor rights outside the territory assigned to them in the area described in Paragraphs **16, 19, and 22 above.**

9. **Amending the territorial assignment maps to reflect the assignments and reassignments requested herein.**

[SIGNATURE PAGE FOLLOWING]

Respectfully Submitted,



K. Chad Burgess
Matthew W. Gissendanner
Mail Code C222
220 Operation Way
Cayce, South Carolina 29033-3701
Tel. No. 803-217-8141 (KCB)
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Email: chad.burgess@scana.com
matthew.gissendanner@scana.com

Attorneys for Petitioner Dominion Energy South
Carolina, Inc.



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Attorney for Petitioners Aiken Electric
Cooperative, Inc. and Little River Electric
Cooperative, Inc.



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Columbia, South Carolina 29211
Tel. No. 803-227-1112
Email: fellerbe@robinsongray.com

Attorney for Petitioner Duke Energy Carolinas,
LLC

May 20, 2019

STATE OF SOUTH CAROLINA)
)
 COUNTY OF LEXINGTON)

VERIFICATION

Personally appeared before me **W. Keller Kissam** who, being duly sworn, deposes and says that he is **President of Electric Operations** of the Petitioner, **Dominion Energy South Carolina, Inc.**; that he has read the foregoing **Joint Petition** and the matters alleged therein are true and correct to the best of his knowledge, information and belief based upon his personal knowledge and his review of the corporate records of **Dominion Energy South Carolina, Inc.** related to the matters alleged in the **Joint Petition**; and that he is fully authorized to verify the contents of the **Joint Petition** on behalf of **Dominion Energy South Carolina, Inc.**

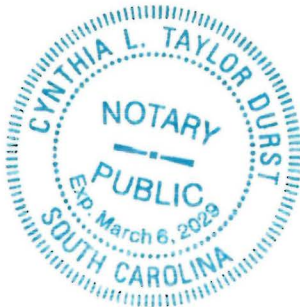
Sworn to before me this
 1 day of May, 2019

Cynthia L. Taylor Durst
Cynthia L. Taylor Durst

Notary Public for South Carolina

My Commission Expires: 3-6-2029

W. Keller Kissam
 W. Keller Kissam



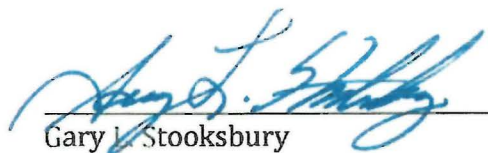
STATE OF SOUTH CAROLINA)
)
 COUNTY OF AIKEN)

VERIFICATION

Personally appeared before me Gary L. Stooksbury who, being duly sworn, deposes and says that he is the Chief Executive Officer of the Petitioner, Aiken Electric Cooperative, Inc.; that he has read the foregoing Joint Petition and the matters alleged therein are true and correct to the best of his knowledge, information and belief based upon his personal knowledge and his review of the corporate records of Aiken Electric Cooperative, Inc. related to the matters alleged in the Joint Petition; and that he is fully authorized to verify the contents of the Joint Petition on behalf of Aiken Electric Cooperative, Inc.

Sworn to before me this

13th day of May, 2019


 Gary L. Stooksbury

Notary Public for South Carolina

My Commission Expires: 6/10/2021



LYNN O. WEST
 NOTARY PUBLIC
 State of South Carolina
 My Commission Expires

STATE OF SOUTH CAROLINA)
)
 COUNTY OF ABBEVILLE)

VERIFICATION

Personally appeared before me **Michael E. Ellis** who, being duly sworn, deposes and says that he is the **General Manager** of the Petitioner, **Little River Electric Cooperative, Inc.**; that he has read the foregoing **Joint** Petition and the matters alleged therein are true and correct to the best of his **knowledge**, information and belief based upon his personal knowledge and his review of the corporate records of **Little River Electric Cooperative, Inc.** related to the matters alleged in the **Joint** Petition; and that he is fully **authorized** to verify the contents of the **Joint** Petition on behalf of **Little River Electric Cooperative, Inc.**

Sworn to before me this

10 day of May, 2019

Dacia M. Smith

Notary Public for South Carolina

My Commission Expires: 5/30/24

Michael E. Ellis
 Michael E. Ellis



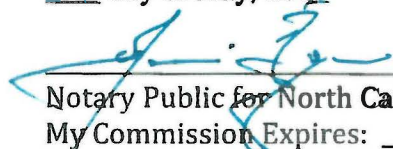
STATE OF NORTH CAROLINA)
)
 COUNTY OF ROWAN)

VERIFICATION

Personally appeared before me Craig Argo who, being duly sworn, deposes and says that he is Technical Service Specialist of the Petitioner, Duke Energy Carolinas, LLC; that he has read the foregoing Joint Petition and the matters alleged therein are true and correct to the best of his knowledge, information and belief based upon his personal knowledge and his review of the corporate records of Duke Energy Carolinas, LLC related to the matters alleged in the Joint Petition; and that he is fully authorized to verify the contents of the Joint Petition on behalf of Duke Energy Carolinas, LLC.

Sworn to before me this
15 day of May, 2019


 Craig Argo


 Notary Public for North Carolina
 My Commission Expires: 04-03-2024



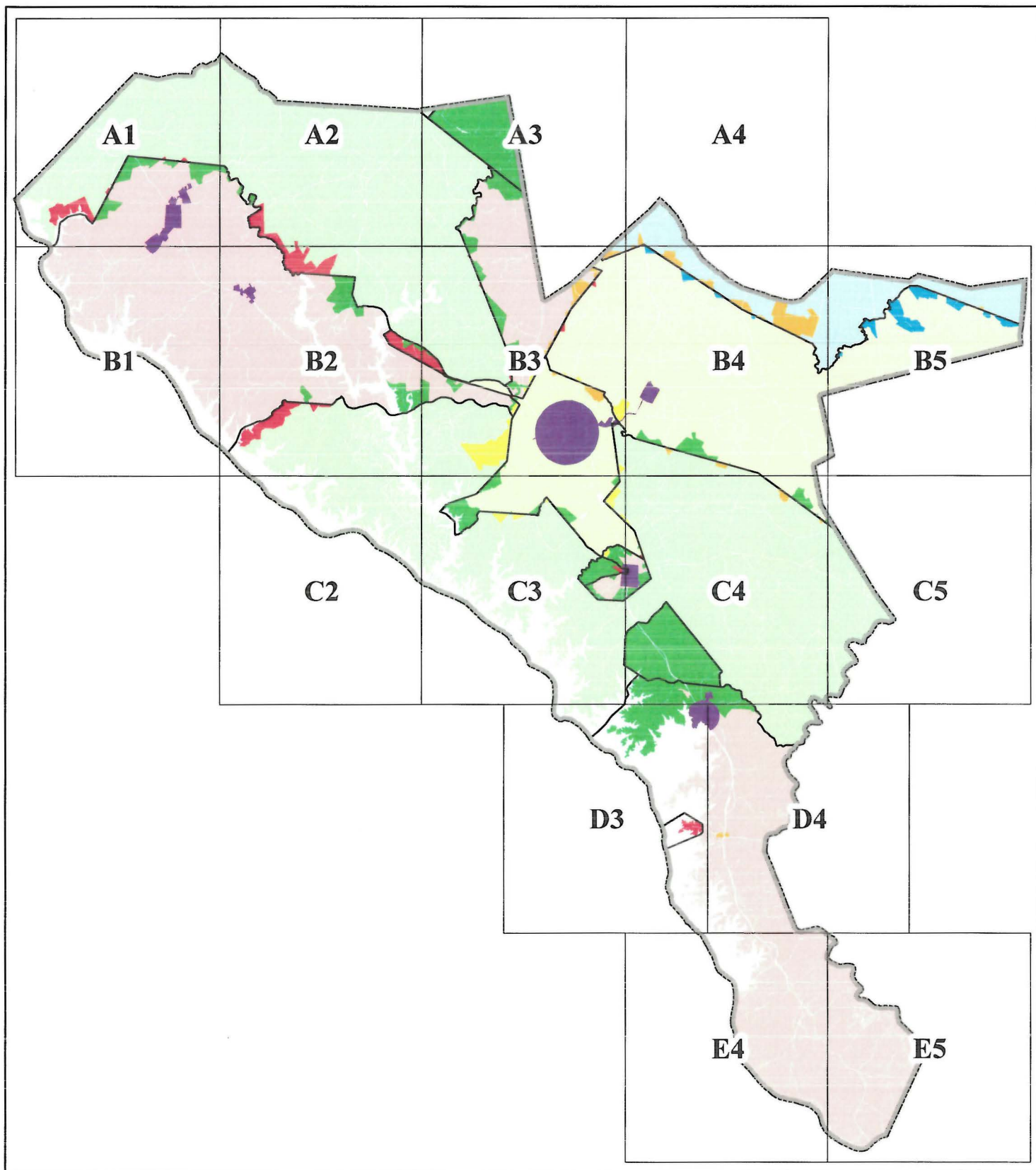


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend	
	McCormick County
	Original Boundary Line
	Municipality
Territory Gain	
	AEC
	Dominion
	Duke
	LREC
	Unassigned
Assigned Territory	
	AEC
	Dominion
	Duke
	LREC
	Unassigned

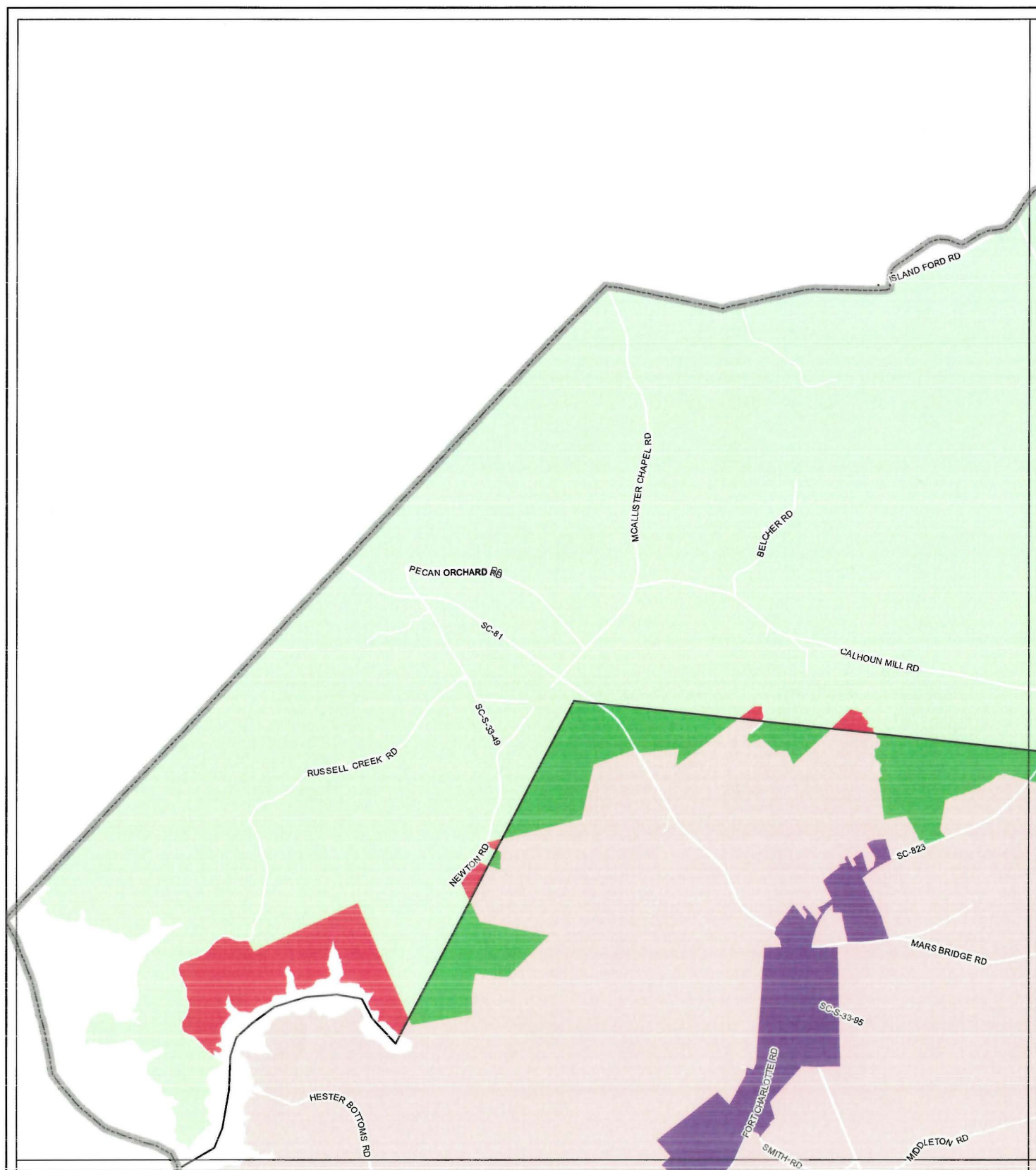


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC - Dominion - Duke - LREC

Legend		
	McCormick County	
	Original Boundary Line	
	Municipality	
Territory Gain		Assigned Territory
	AEC	AEC
	Dominion	Dominion
	Duke	Duke
	LREC	LREC
	Unassigned	Unassigned

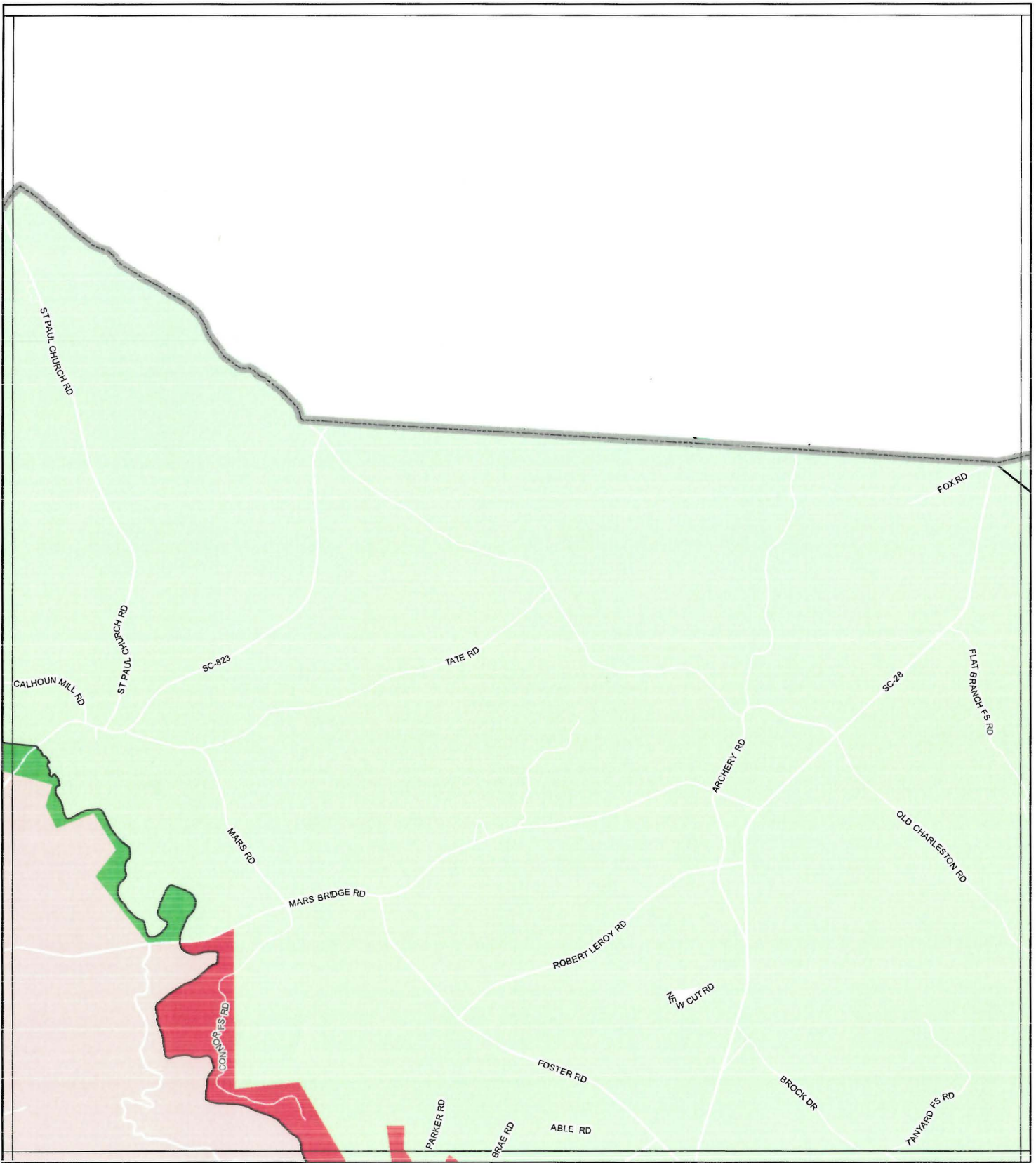


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC - Dominion - Duke - LREC

Legend		Territory Gain		Assigned Territory	
	McCormick County		AEC		AEC
	Original Boundary Line		Dominion		Dominion
	Municipality		Duke		Duke
			LREC		LREC
			Unassigned		Unassigned

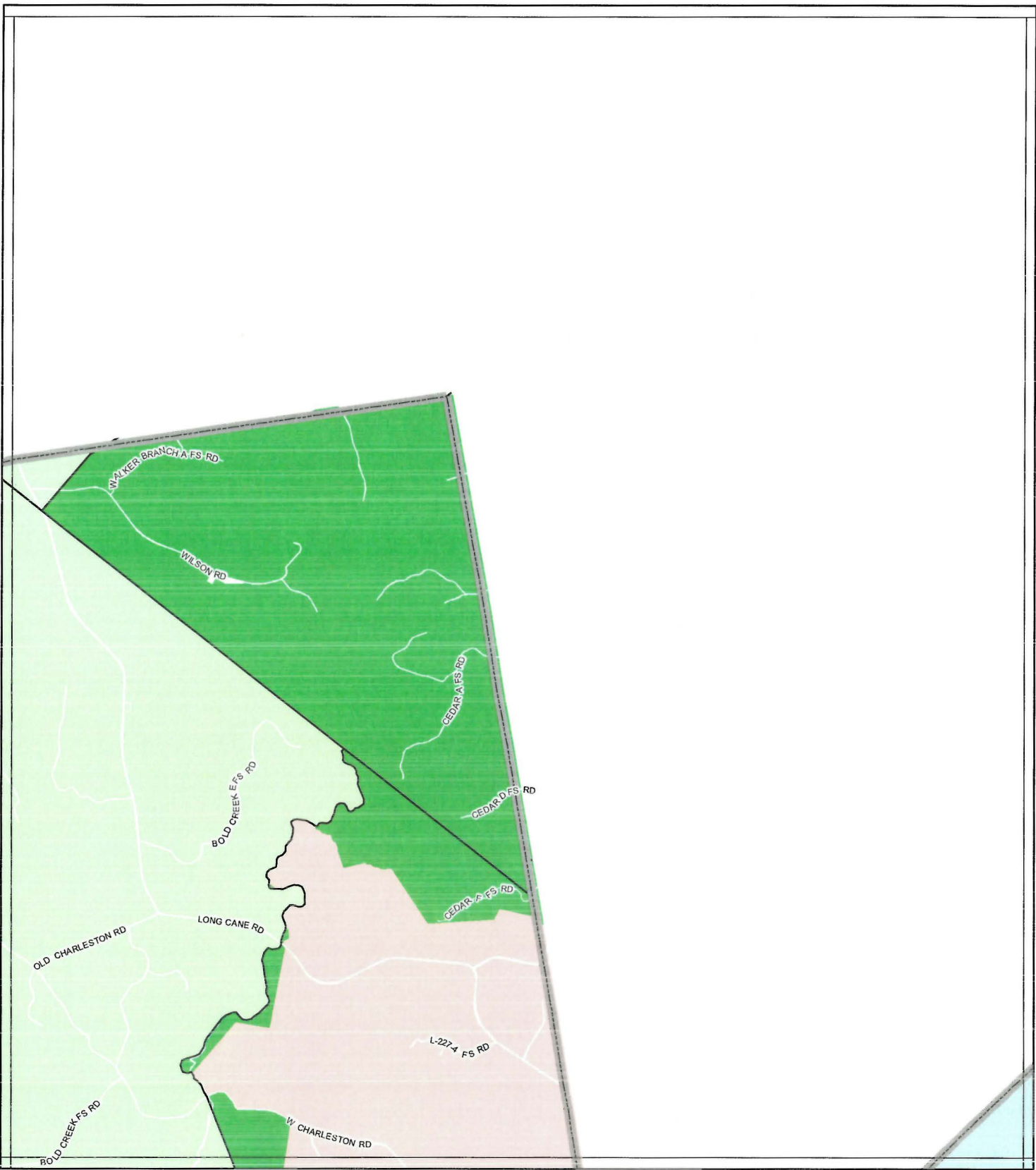














Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend	
 McCormick County	
 Original Boundary Line	
 Municipality	
Territory Gain	
 AEC	
 Beminton	
 Duke	
 LREC	
 Unassigned	
Assigned Territory	
 AEC	
 Dominion	
 Duke	
 LREC	
 Unassigned	

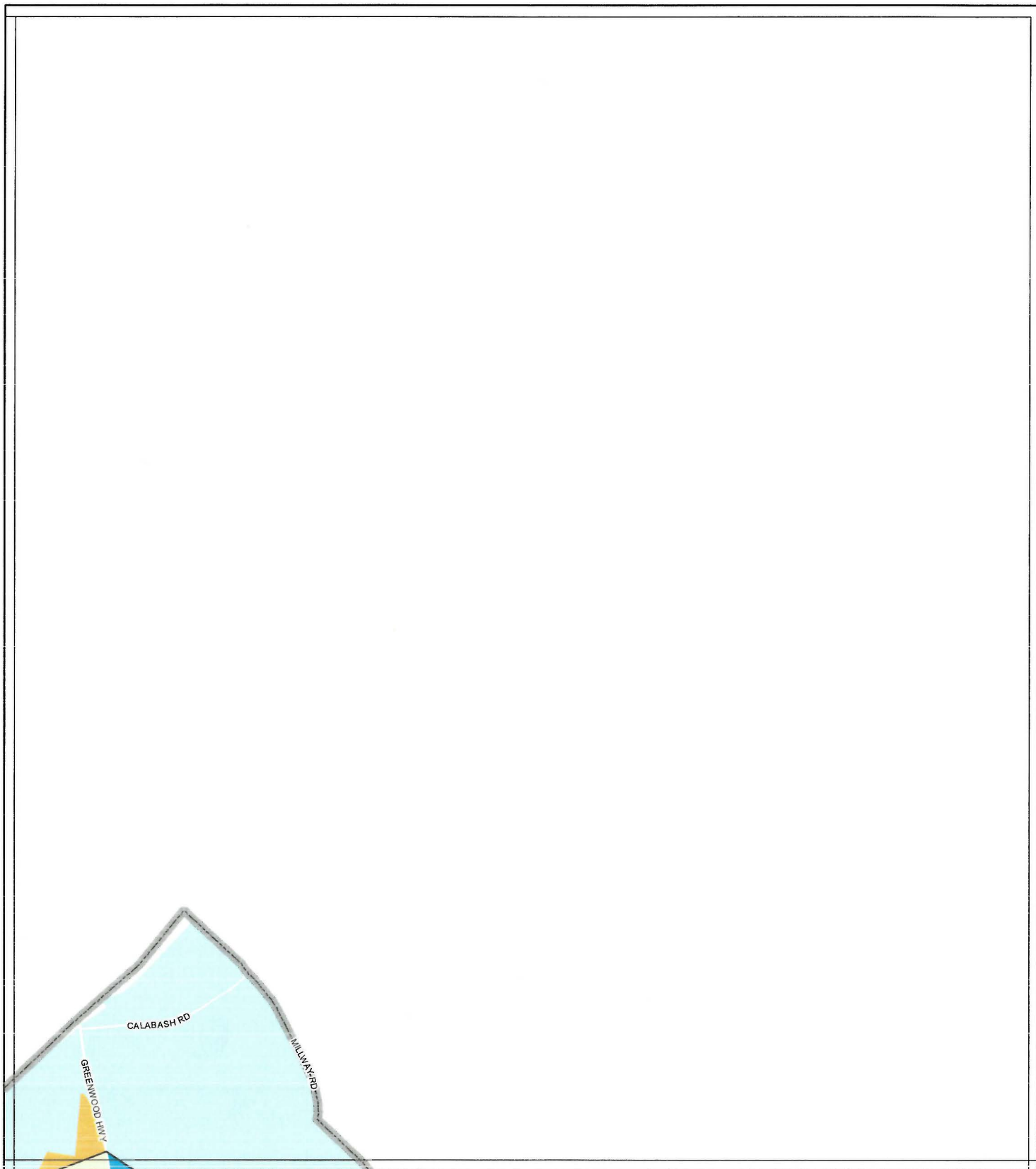


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend

McCormick County	Territory Gain	Assigned Territory
Original Boundary Line	AEC	AEC
Municipality	Dominion	Dominion
	Duke	Duke
	LREC	LREC
	Unassigned	Unassigned

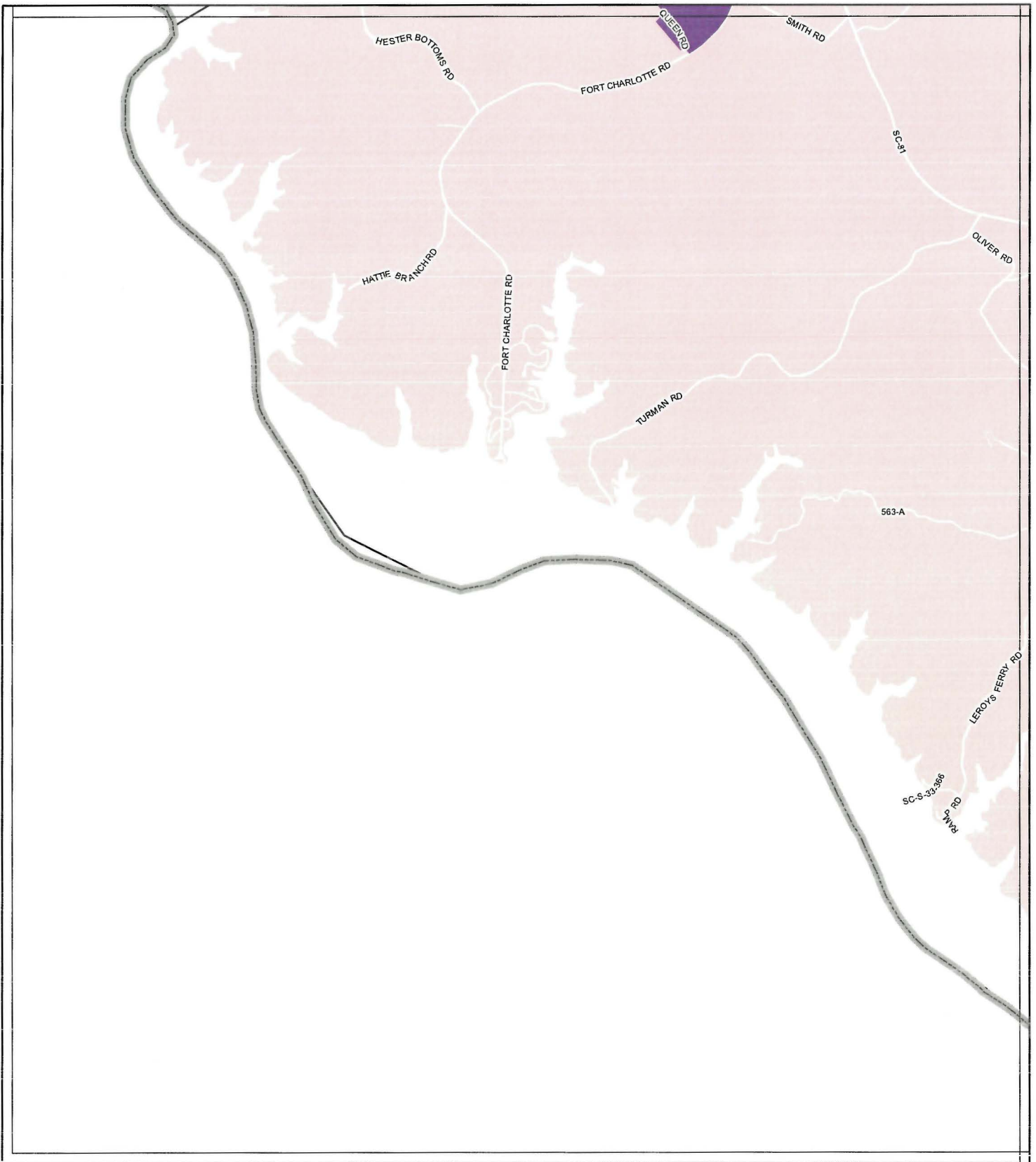















Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend

	McCormick County	Territory Gain	Assigned Territory
	Original Boundary Line	 AEC	 AEC
	Municipality	 Dominion	 Dominion
		 Duke	 Duke
		 LREC	 LREC
		 Unassigned	 Unassigned

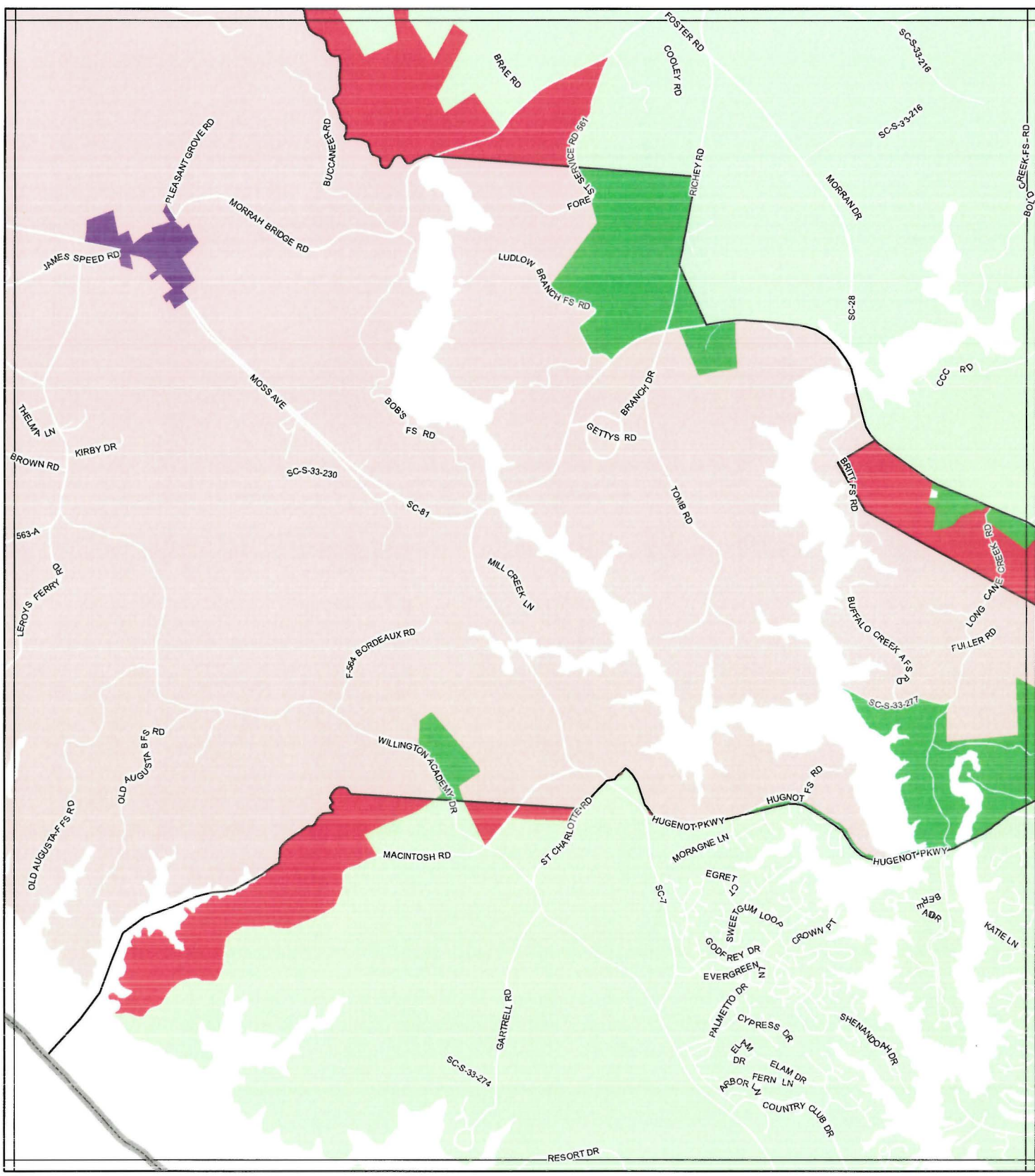


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend	
	McCormick County
	Original Boundary Line
	Municipality
Territory Gain	
	AEC
	Dominion
	Duke
	LREC
	Unassigned
Assigned Territory	
	AEC
	Dominion
	Duke
	LREC
	Unassigned

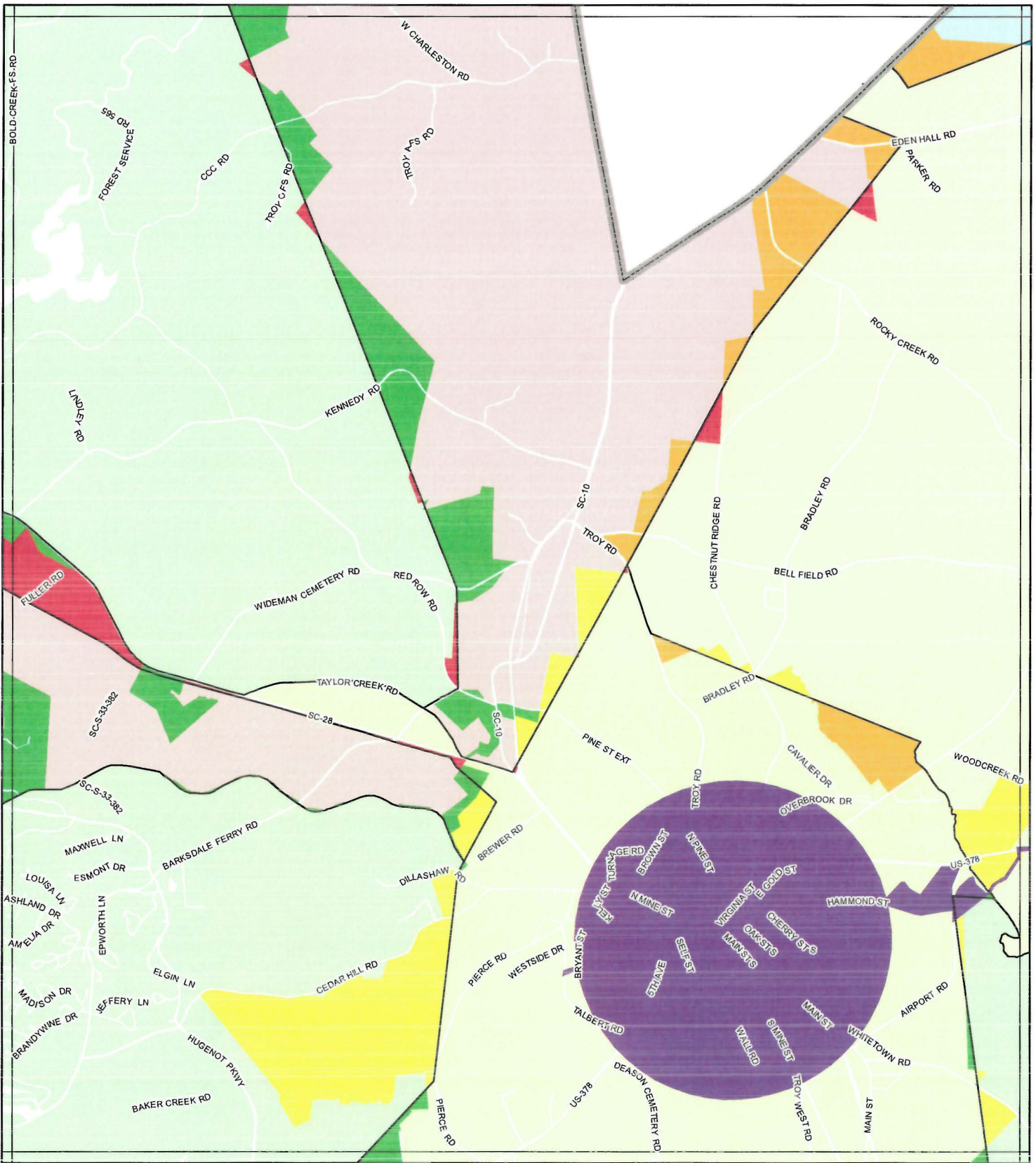



Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend		
	McCormick County	
	Original Boundary Line	
	Municipality	
Territory Gain		
	AEC	
	Dominion	
	Duke	
	LREC	
	Unassigned	
Assigned Territory		
	AEC	
	Dominion	
	Duke	
	LREC	
	Unassigned	

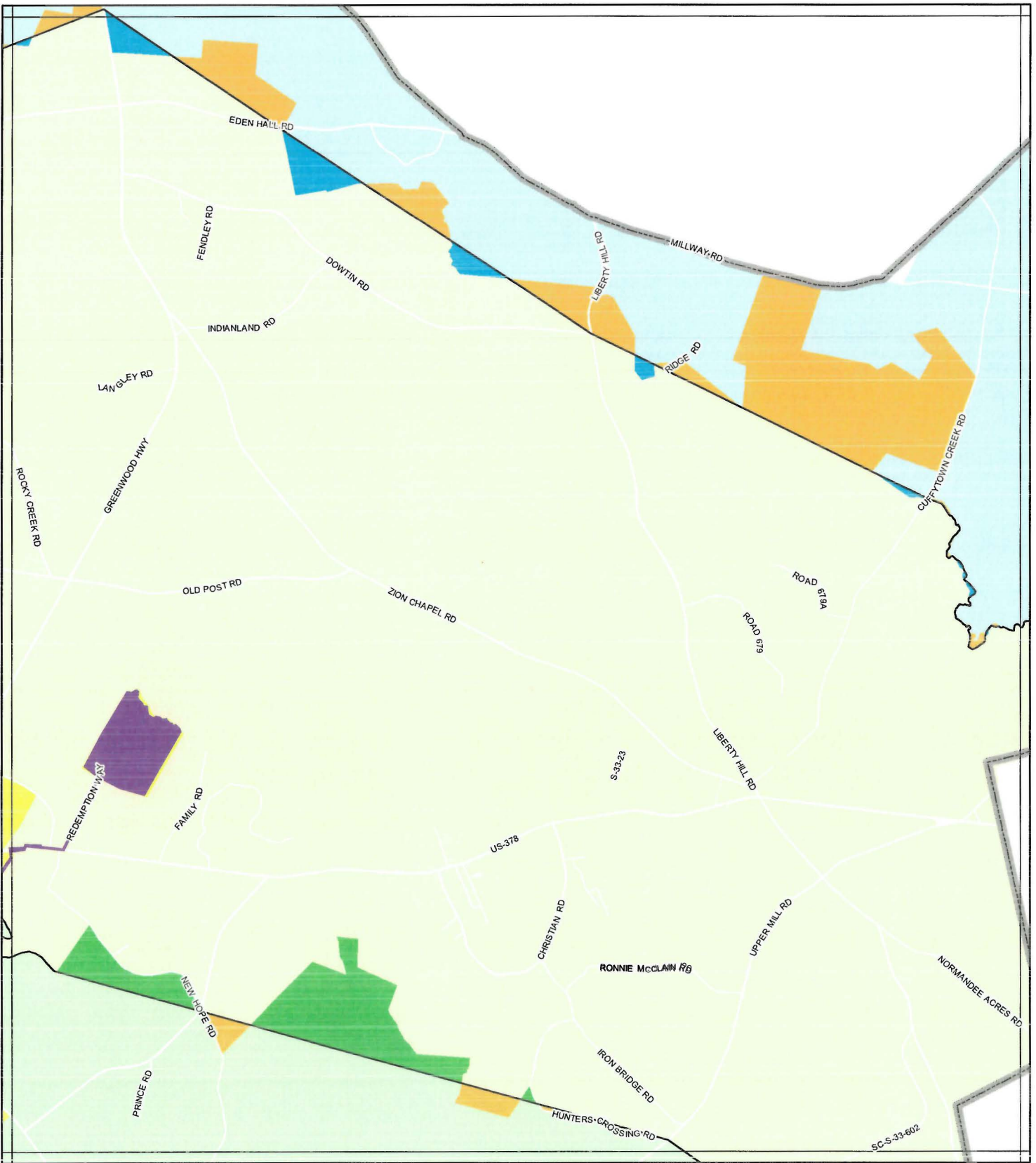


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend	
	McCormick County
	Original Boundary Line
	Municipality
Territory Gain	
	AEC
	Dominion
	Duke
	LREC
	Unassigned
Assigned Territory	
	AEC
	Dominion
	Duke
	LREC
	Unassigned

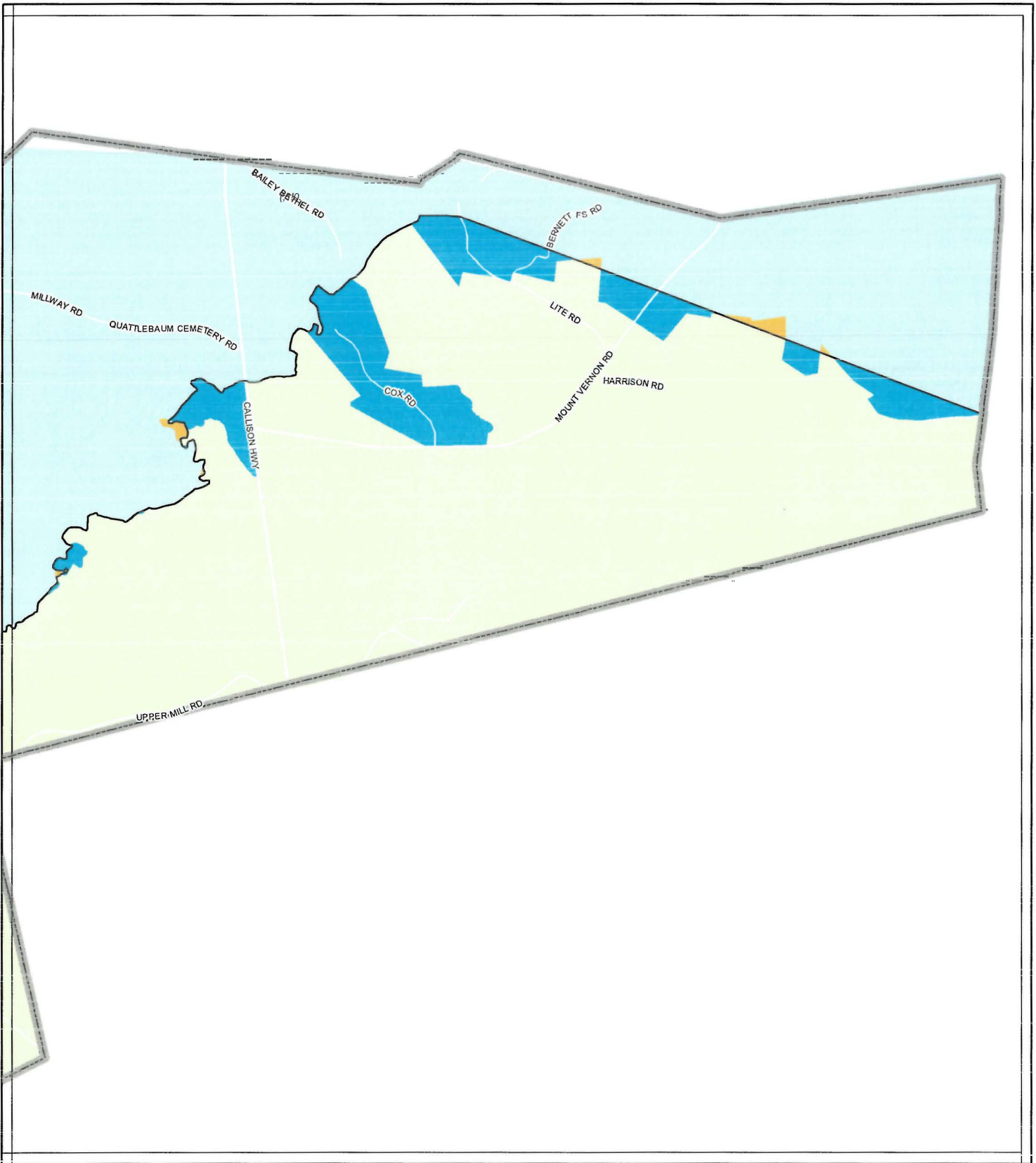


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC - Dominion - Duke - LREC

Legend	
McCormick County	Territory Gain
Original Boundary Line	Assigned Territory
Municipality	
AEC	AEC
Dominion	Dominion
Duke	Duke
LREC	LREC
Unassigned	Unassigned

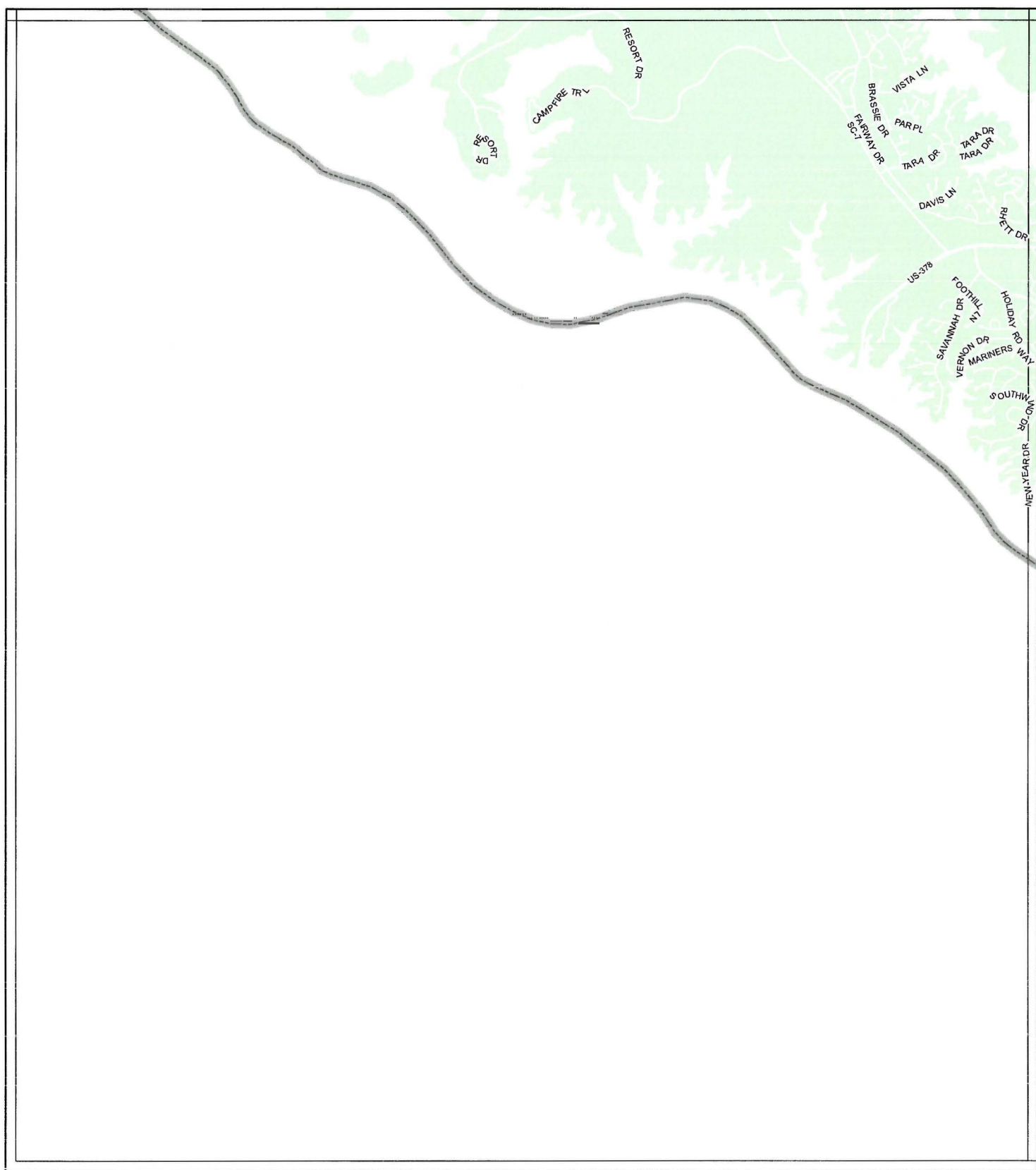


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC - Dominion - Duke - LREC

Legend

McCormick County	Territory Gain	Assigned Territory
Original Boundary Line	AEC	AEC
Municipality	Dominion	Dominion
	Duke	Duke
	LREC	LREC
	Unassigned	Unassigned

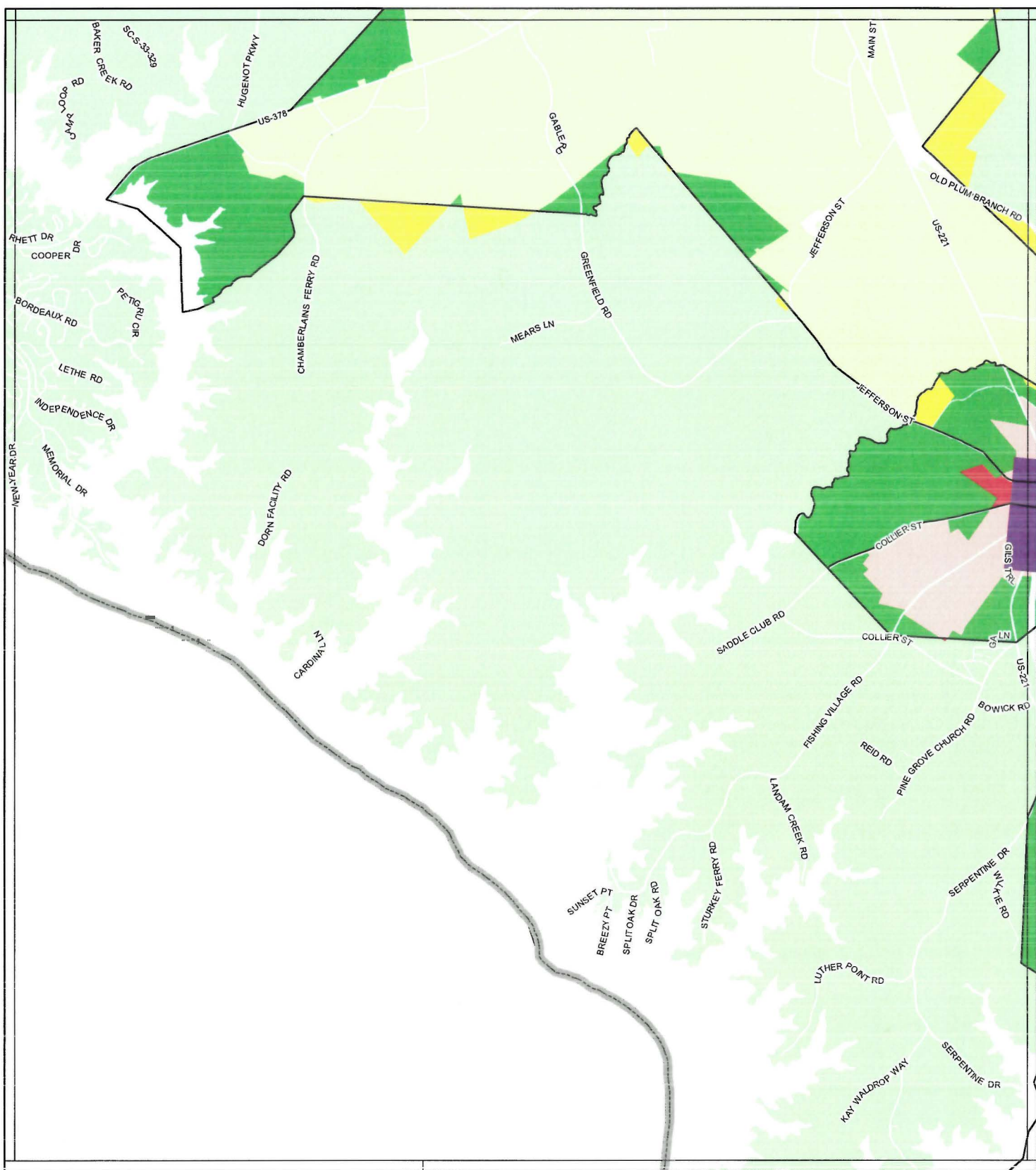


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend	
	McCormick County
	Original Boundary Line
	Municipality
Territory Gain	
	AEC
	Dominion
	Duke
	LREC
	Unassigned
Assigned Territory	
	AEC
	Dominion
	Duke
	LREC
	Unassigned

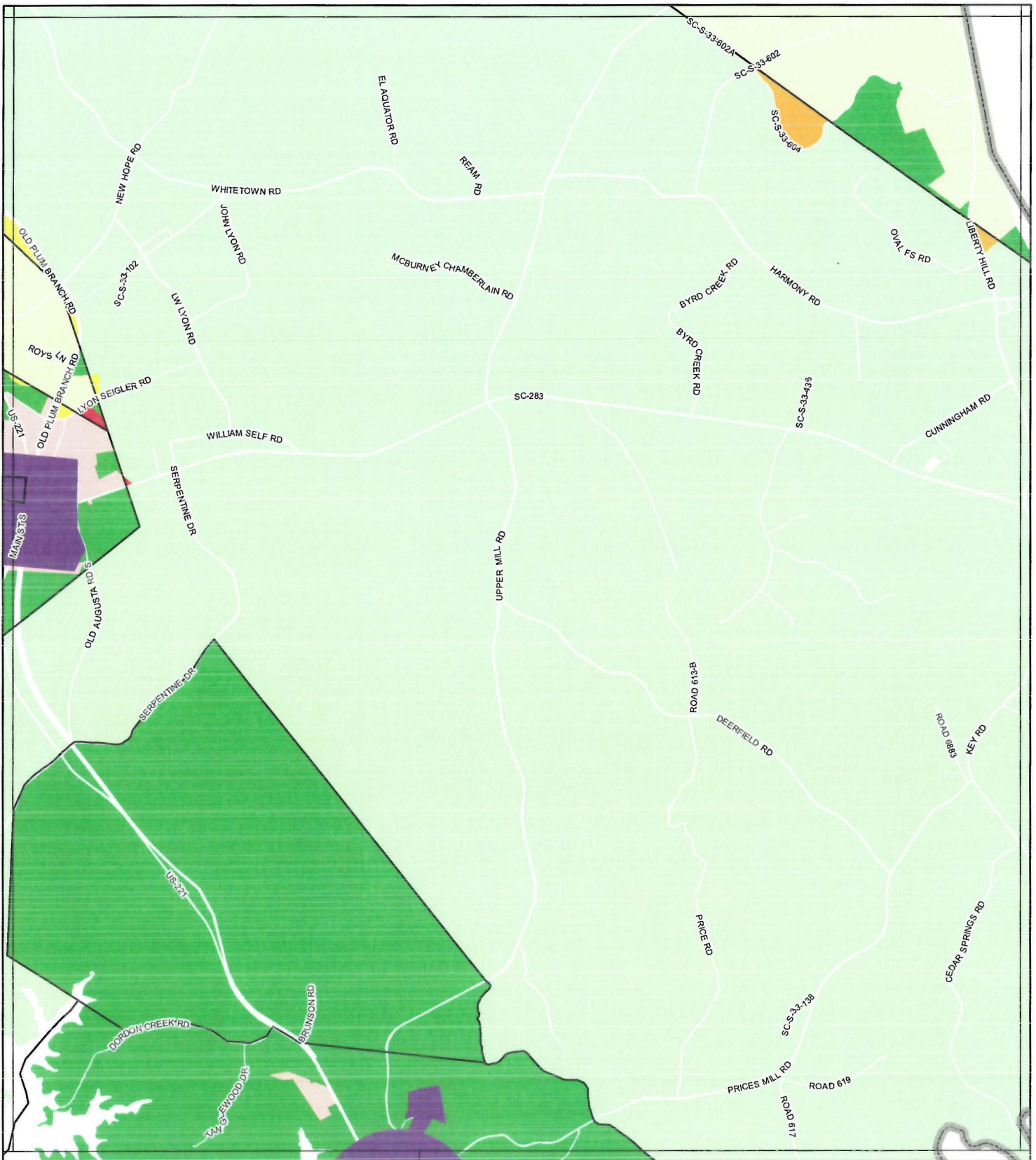


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend

	McCormick County		AEC		AEC
	Original Boundary Line		Dominion		Dominion
	Municipality		Duke		Duke
			LREC		LREC
			Unassigned		Unassigned

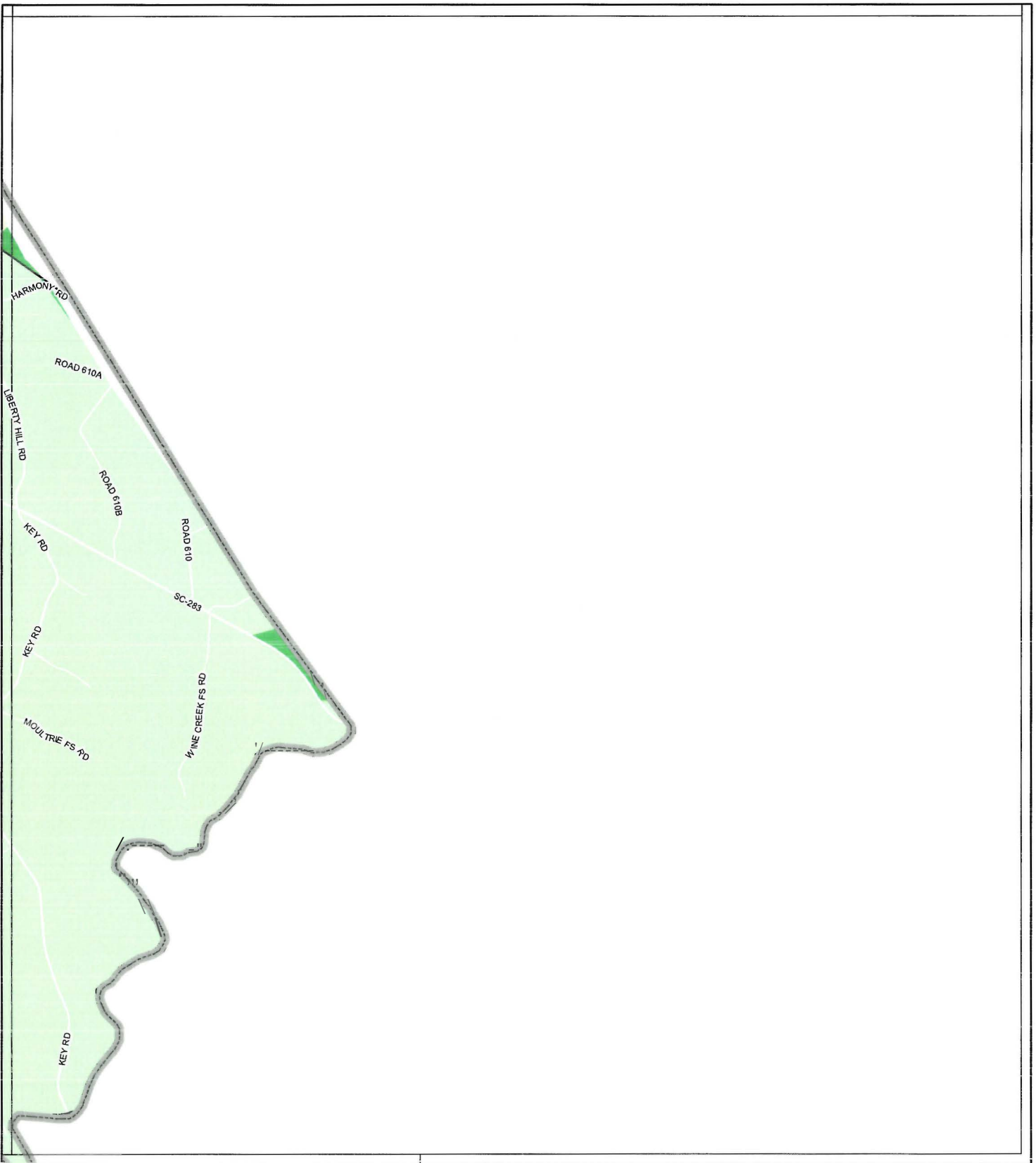


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend

	McCormick County	Territory Gain	Assigned Territory
	Original Boundary Line	AEC	AEC
	Municipality	Dominion	Dominion
		Duke	Duke
		LREC	LREC
		Unassigned	Unassigned

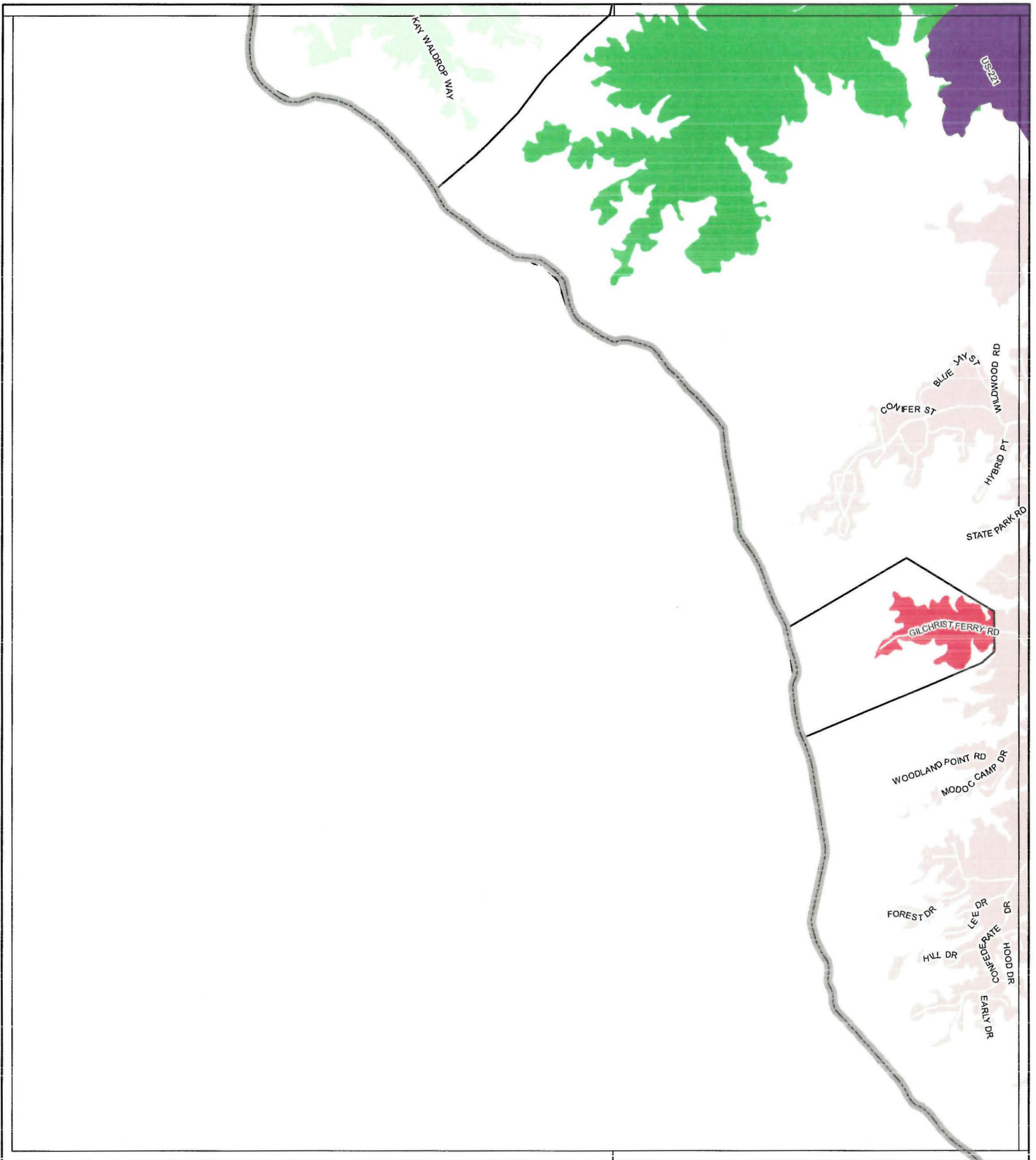


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC - Dominion - Duke - LREC

Legend	
McCormick County	Territory Gain
Original Boundary Line	Assigned Territory
Municipality	
AEC	AEC
Dominion	Dominion
Duke	Duke
LREC	LREC
Unassigned	Unassigned

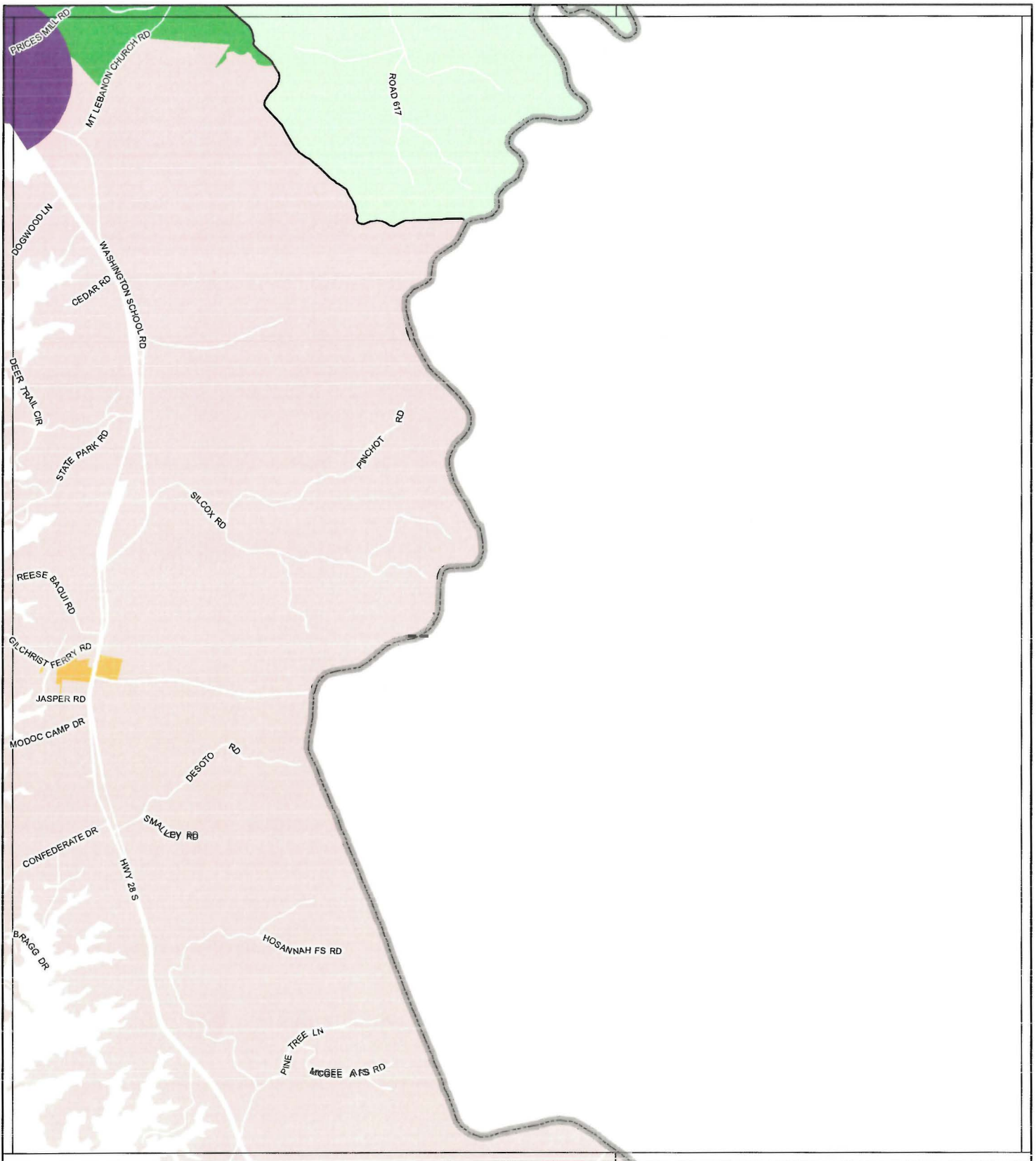


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC - Dominion - Duke - LREC

Legend	
McCormick County	
Original Boundary Line	
Municipality	
Territory Gain	Assigned Territory
AEC	AEC
Dominion	Dominion
Duke	Duke
LREC	LREC
Unassigned	Unassigned

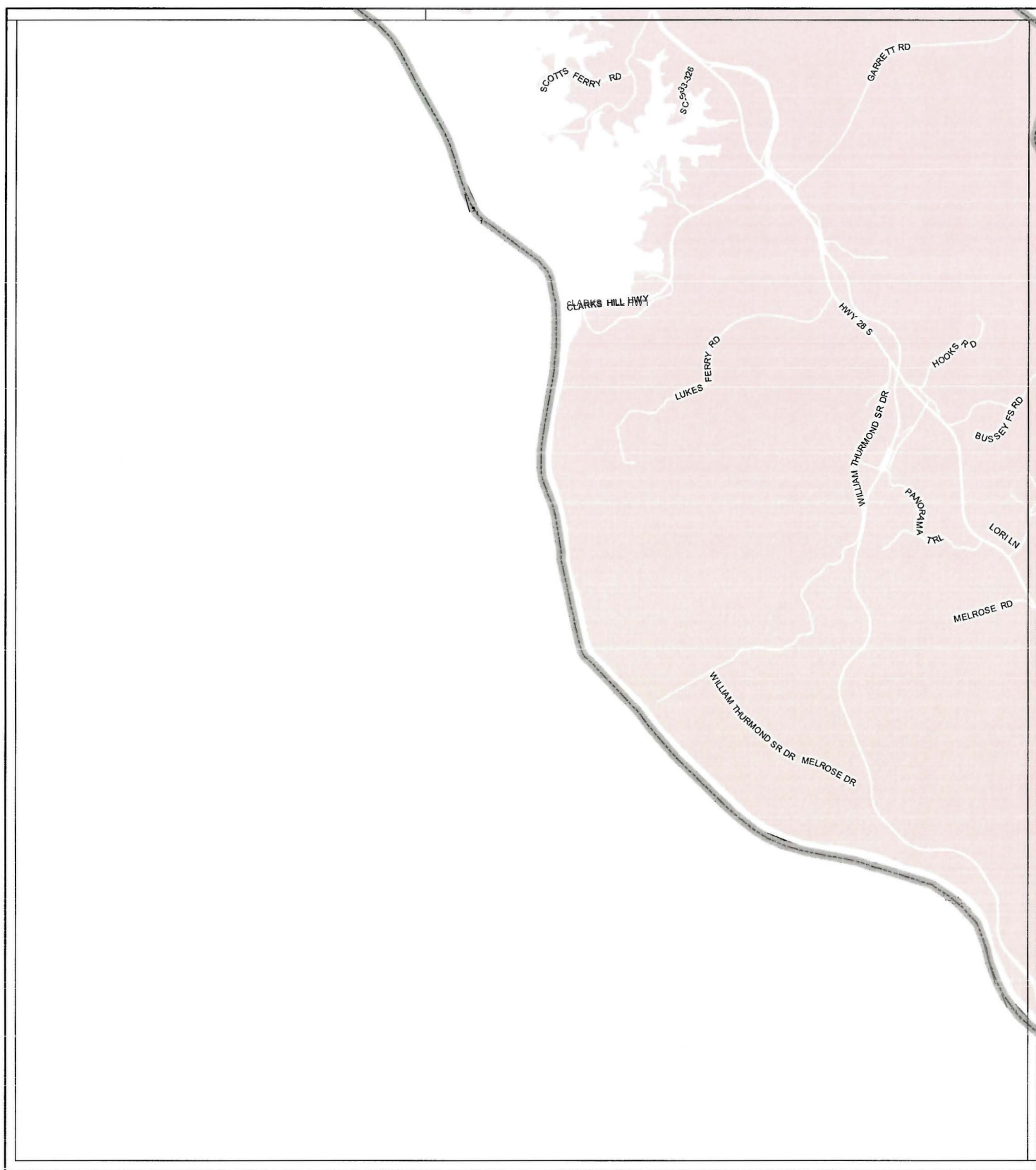


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend

- McCormick County
- Original Boundary Line
- Municipality

Territory Gain

- AEC
- Dominion
- Duke
- LREC
- Unassigned

Assigned Territory

- AEC
- Dominion
- Duke
- LREC
- Unassigned

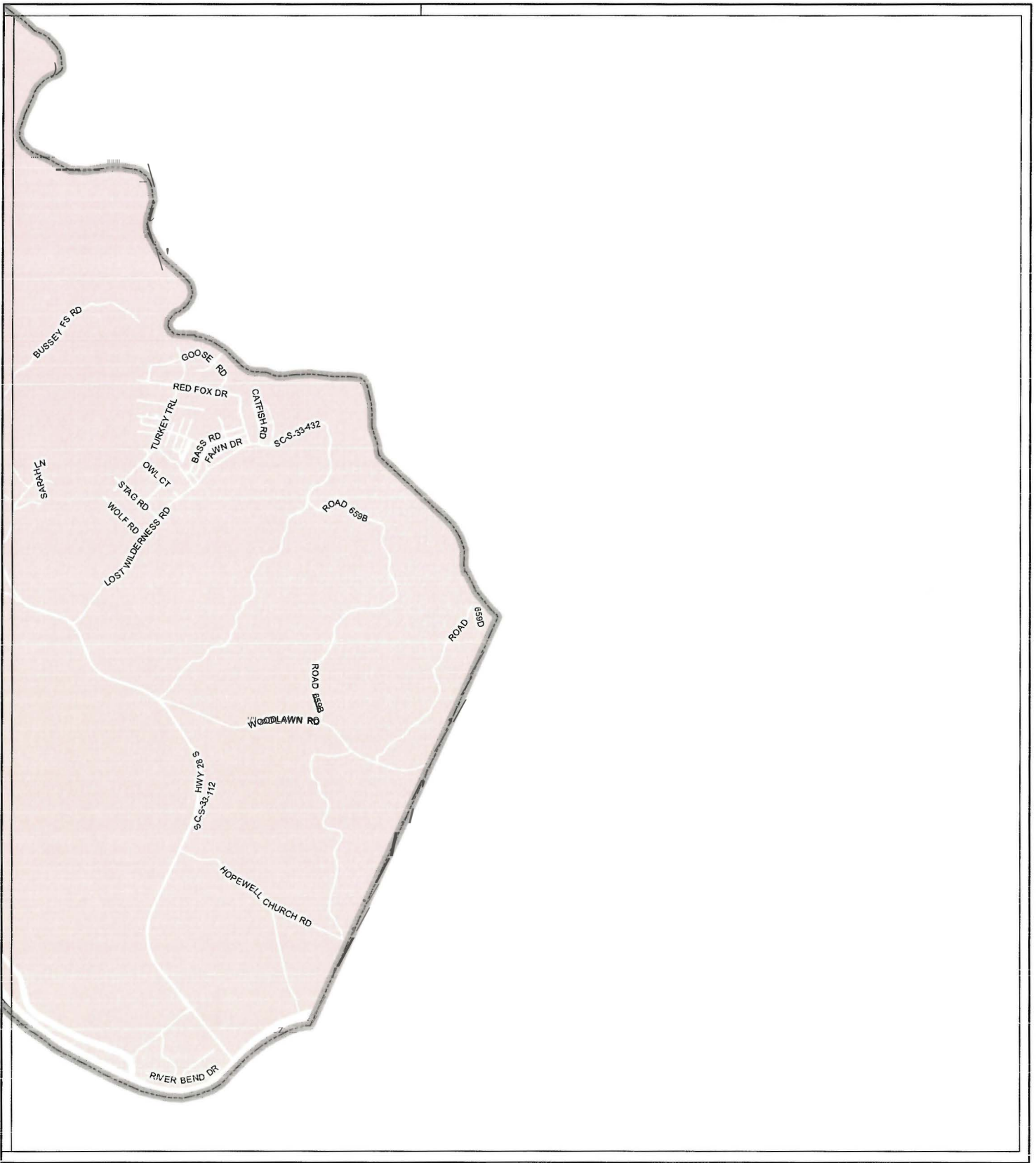


Exhibit 1:
2019 Territorial Assignment realigned to McCormick County Parcels
Final Agreement between AEC- Dominion- Duke- LREC

Legend	
McCormick County	
Original Boundary Line	
Municipality	
Territory Gain	
AEC	
Dominion	
Duke	
LREC	
Unassigned	
Assigned Territory	
AEC	
Dominion	
Duke	
LREC	
Unassigned	

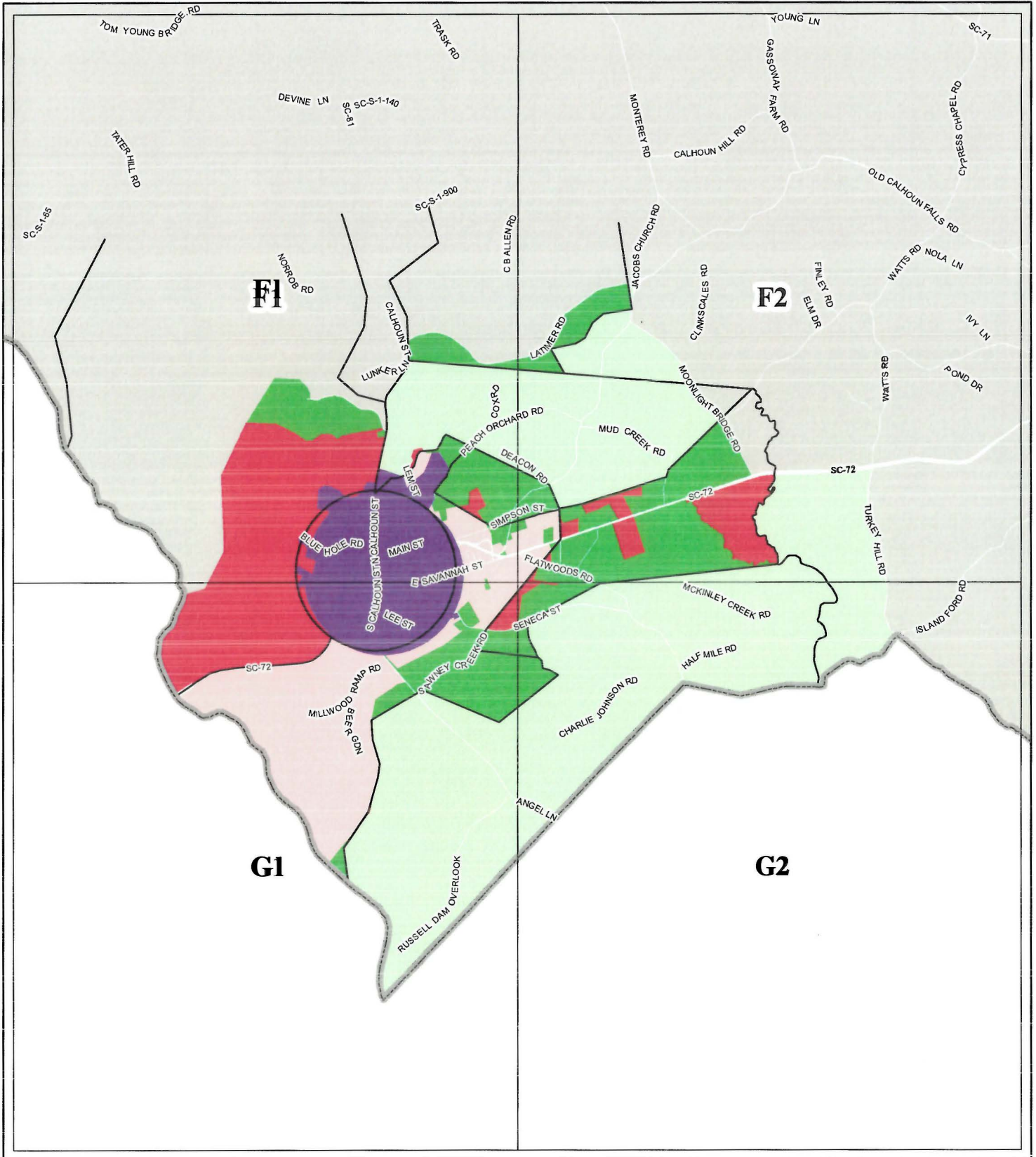


Exhibit 2:
2019 Territorial Assignment realigned to Abbeville County Parcels
Final Agreement between Dominion- LREC

Legend

- | | | | |
|------------------------|-----------------------|---------------------------|----------------------------|
| Abbeville County | Territory Gain | Assigned Territory | Abbeville Parcels Excluded |
| Original Boundary Line | Dominion | Dominion | |
| Municipality | LREC | LREC | |

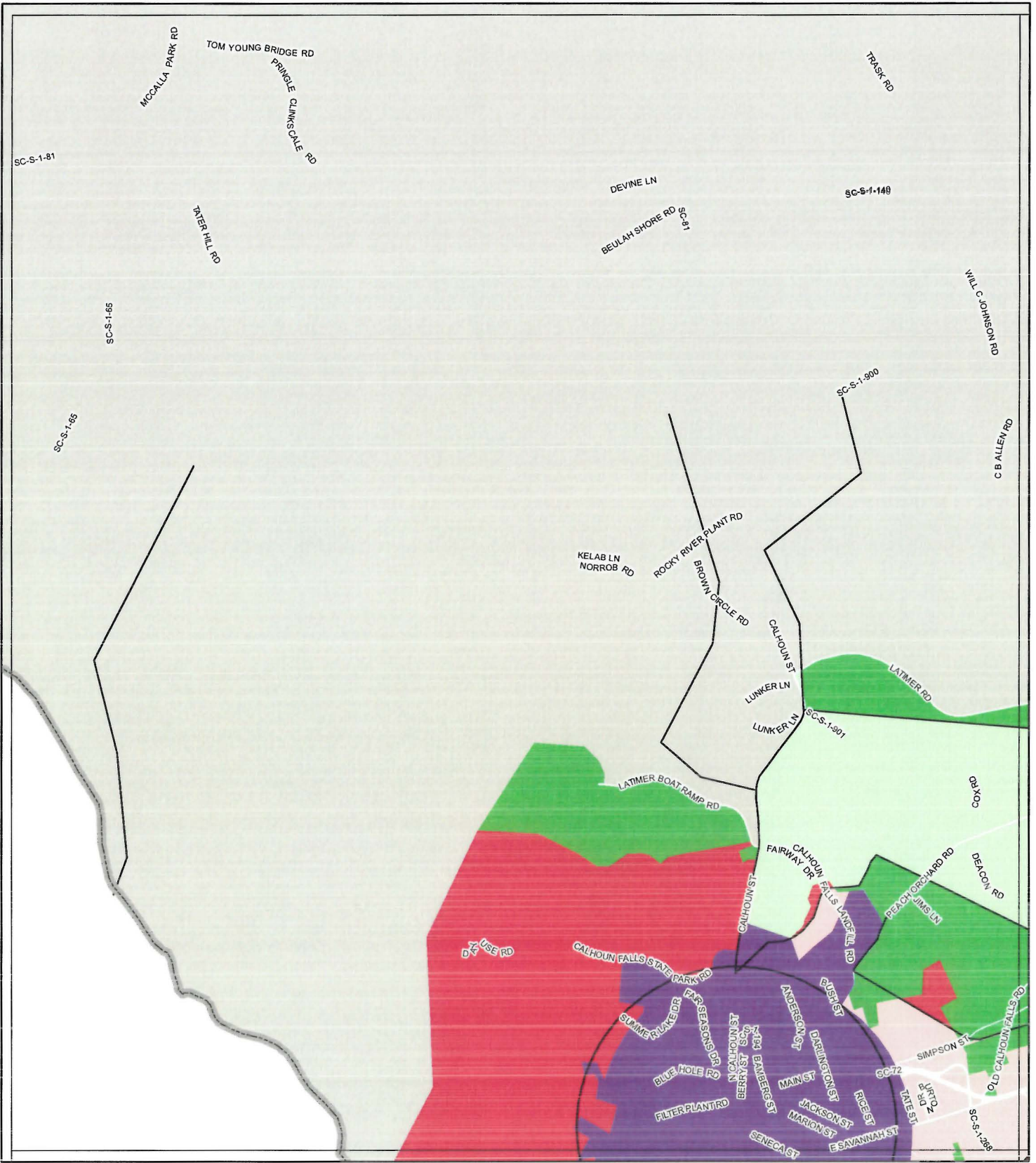


Exhibit 2:
2019 Territorial Assignment realigned to Abbeville County Parcels
Final Agreement between Dominion- LREC

Legend

Abbeville County	Territory Gain	Assigned Territory	Abbeville Parcels Excluded
Original Boundary Line	Dominion	Dominion	
Municipality	LREC	LREC	

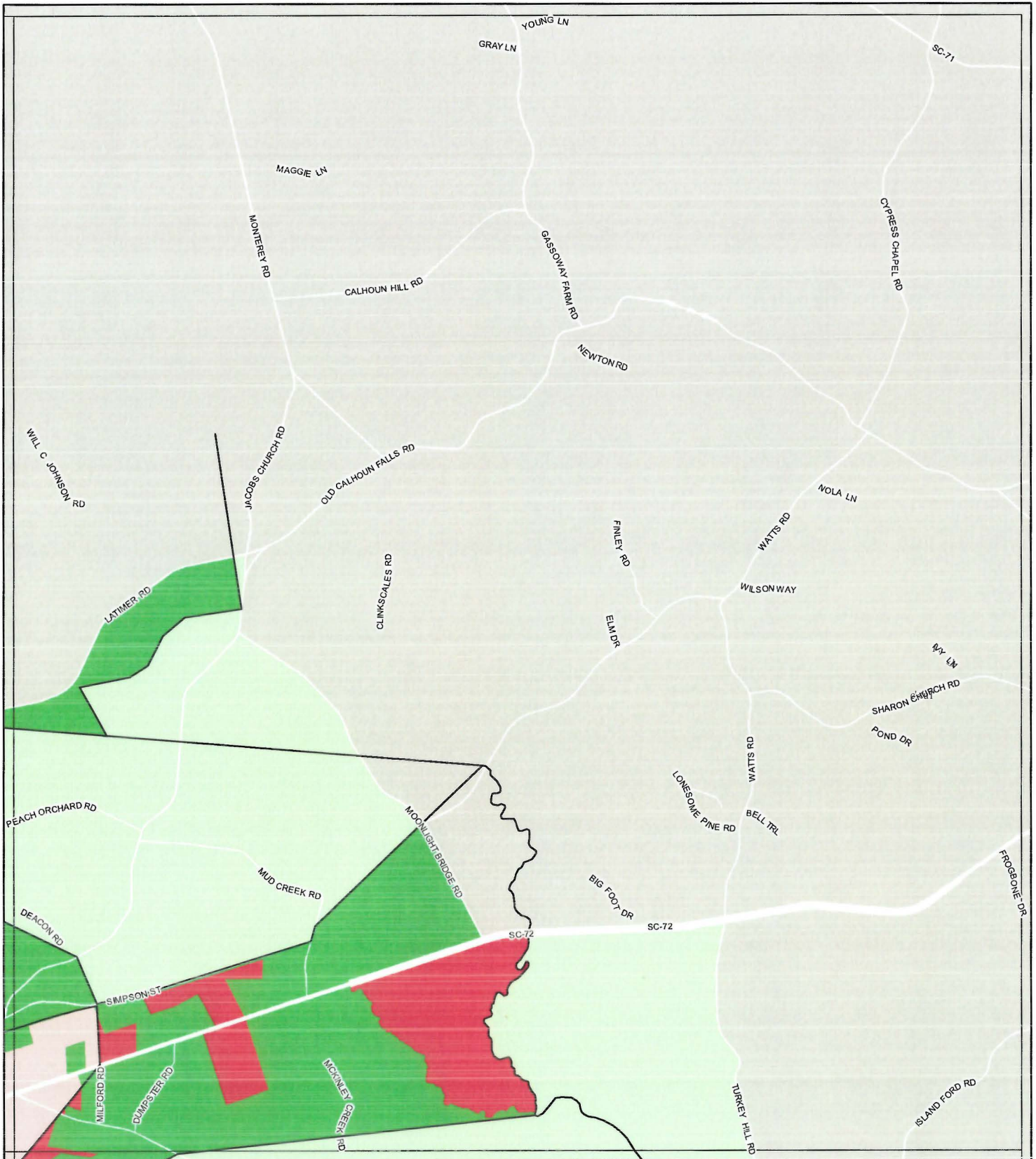












Exhibit 2:
2019 Territorial Assignment realigned to Abbeville County Parcels
Final Agreement between Dominion- LREC

Legend

	Abbeville County		Territory Gain		Assigned Territory		Abbeville Parcels Excluded
	Original Boundary Line		Dominion		Dominion		
	Municipality		LREC		LREC		

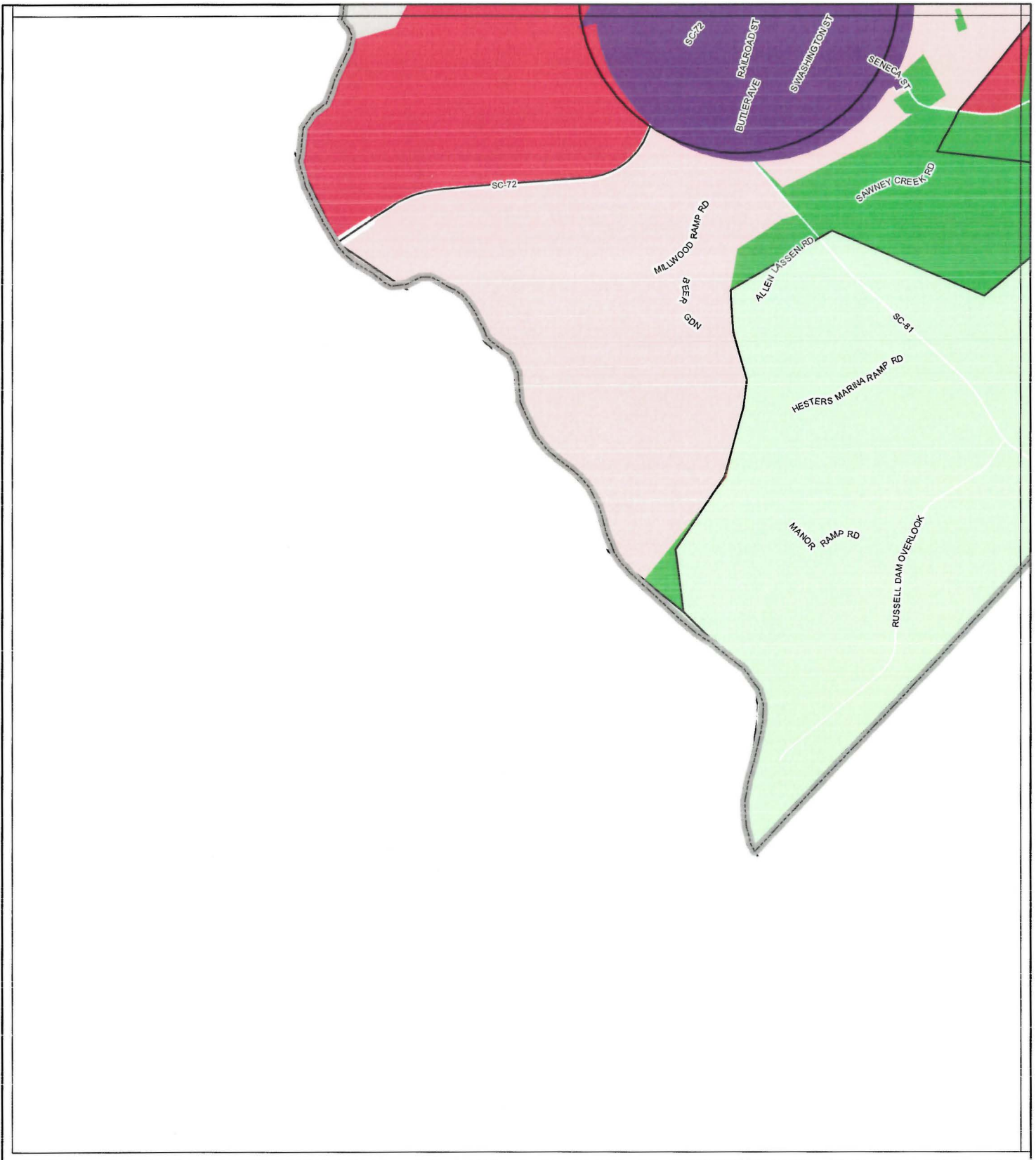


Exhibit 2:
2019 Territorial Assignment realigned to Abbeville County Parcels
Final Agreement between Dominion - LREC

Legend

	Abbeville County	Territory Gain	Assigned Territory		Abbeville Parcels Excluded
	Original Boundary Line		Dominion		Dominion
	Municipality		LREC		LREC

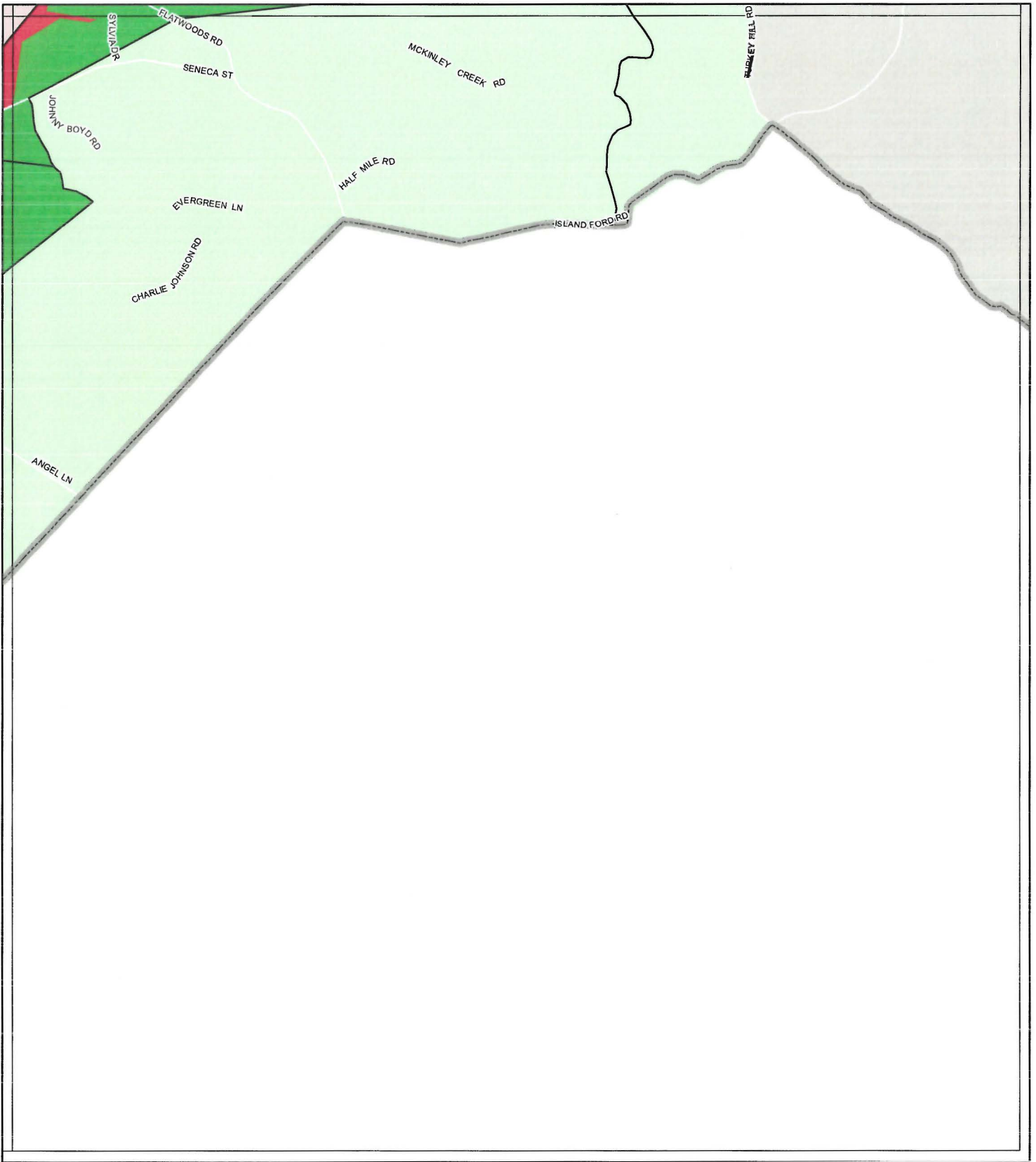


Exhibit 2:
2019 Territorial Assignment realigned to Abbeville County Parcels
Final Agreement between Dominion - LREC

Legend

 Abbeville County	Territory Gain	Assigned Territory	 Abbeville Parcels Excluded
 Original Boundary Line	 Dominion	 Dominion	
 Municipality	 LREC	 LREC	

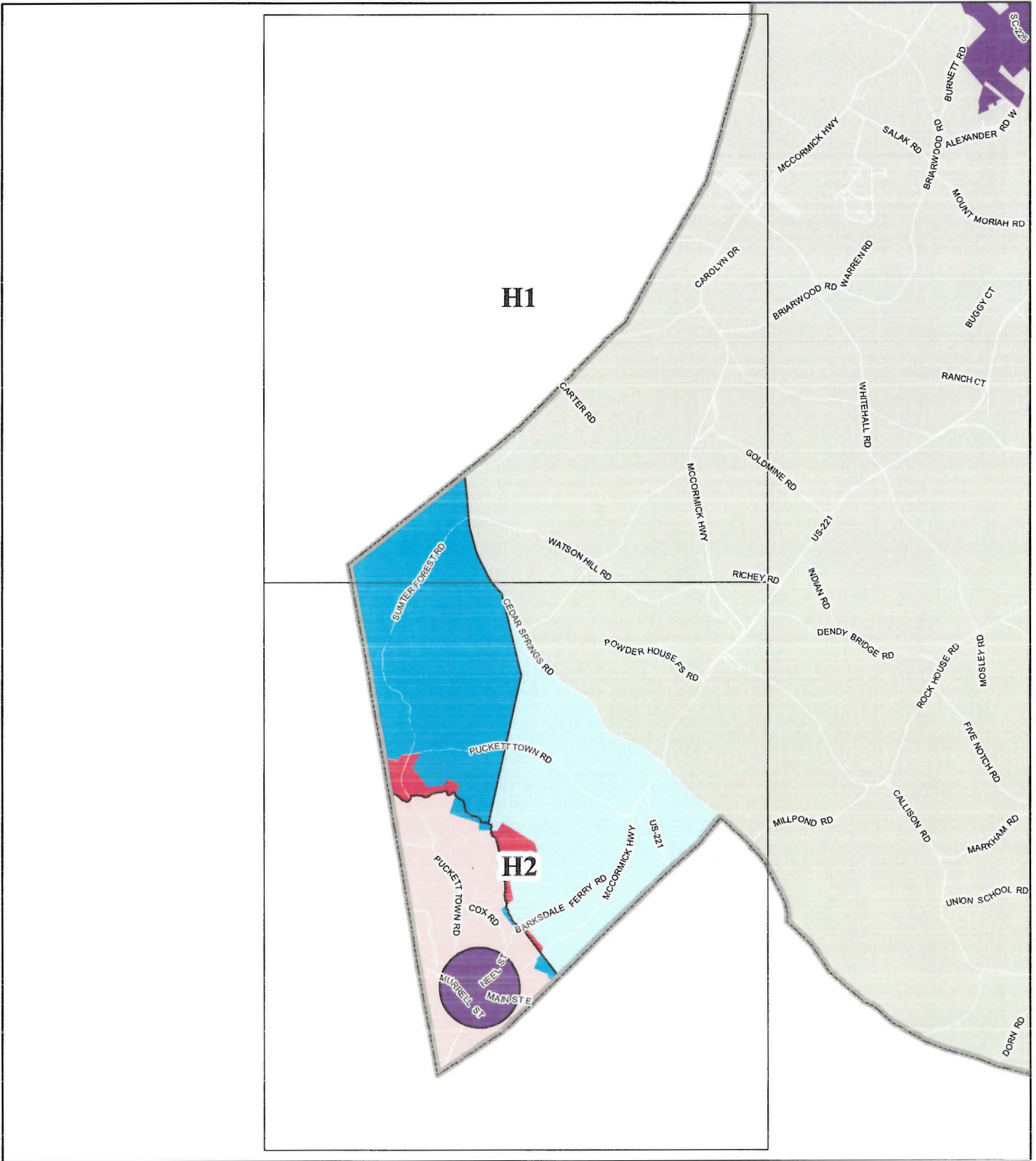


Exhibit 3:
2019 Territorial Assignment realigned to Greenwood County Parcels
Final Agreement between AEC - Dominion - Duke







Legend		Territory Gain Assigned Territory		Greenwood Parcels Excluded	
	Greenwood County		AEC		AEC
	Original Boundary Line		Dominion		Dominion
	Municipality		Duke		Duke



Exhibit 3:
2019 Territorial Assignment realigned to Greenwood County Parcels
Final Agreement between AEC - Dominion - Duke

Legend

 Greenwood County	Territory Gain	Assigned Territory	 Greenwood Parcels Excluded
 Original Boundary Line	 AEC	 AEC	
 Municipality	 Dominion	 Dominion	
	 Duke	 Duke	

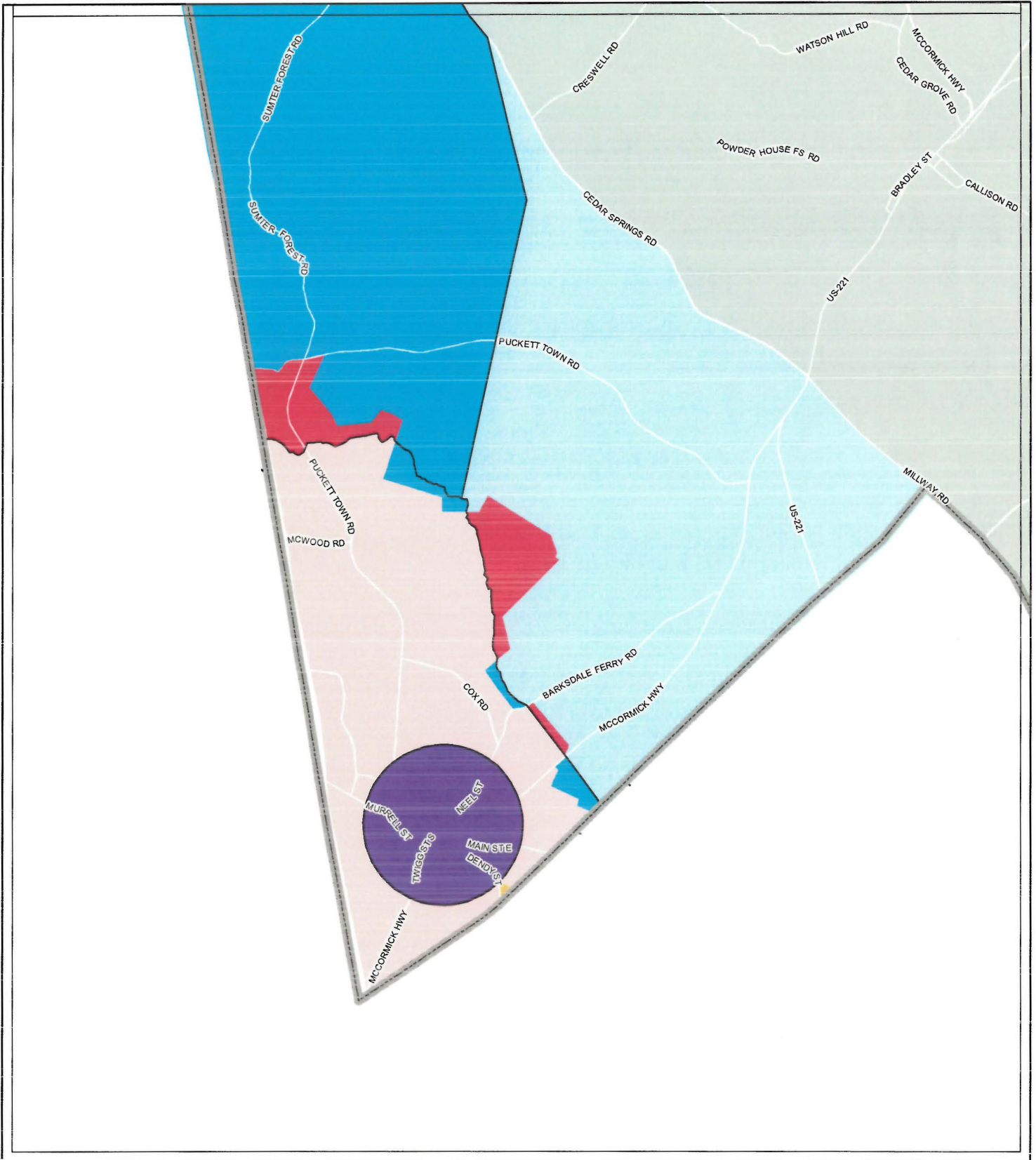


Exhibit 3:
2019 Territorial Assignment realigned to Greenwood County Parcels
Final Agreement between AEC - Dominion - Duke

Legend

	Greenwood County	Territory Gain Assigned Territory		Greenwood Parcels Excluded
	Original Boundary Line			AEC
	Municipality			Dominion
				Duke